THMKEN

ASSOCIATE HANDBOOK

2019

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INTRODUCTION

The Timken Company

World Headquarters 4500 Mount Pleasant Street, N.W. PO Box 6929 North Canton, Ohio 44720

Phone: 234-262-3000 Website: www.Timken.com

INTRODUCTION

This handbook is intended to provide U.S. associates with a general understanding of Timken's personnel policies and general guidelines for the conduct of associates of the company. It is impossible to address every situation that will arise during the course of your employment. We have explained some of the rules, regulations and policies of the company, and it is each associate's responsibility to become familiar with these policies. If you have a question or do not understand any of the materials, you should ask your supervisor, your manager or a representative of the human resource department to clarify your uncertainty.

This handbook supersedes all earlier versions of personnel manuals or associate handbooks. All associate handbooks remain the property of the company.

The company is committed to reviewing all policies and regulations and will update this handbook from time to time. We reserve the right to terminate, revise or modify any provision of this handbook at any time. Likewise, while the company strives for consistency in its operations, upon certain circumstances, the company may exercise its discretion in applying the policies set forth herein, which may include deviating from the language contained in this handbook.

Further, while every attempt has been made to create these policies consistent with federal and state law, if an inconsistency arises, the policy will be enforced consistently with the applicable law.

DISCLAIMERS

Nothing in this handbook or any of the company policies set forth in this handbook shall be construed to limit, in any way, your rights under applicable federal, state or local laws, including, but not limited to the National Labor Relations Act.

NEITHER THIS HANDBOOK, NOR ANY OTHER TIMKEN DOCUMENT CONFERS ANY CONTRACTUAL RIGHT, EITHER EXPRESSED OR IMPLIED, TO REMAIN IN THE COMPANY'S EMPLOYMENT; NOR DOES THIS HANDBOOK GUARANTEE ANY FIXED TERMS OR CONDITIONS OF YOUR EMPLOYMENT.

EQUAL OPPORTUNITY POLICY

The Timken Company is committed to provide a work environment free from all types of unlawful discrimination and harassment, including sexual harassment and harassment based on an individual's gender, race, color, national origin, ancestry, religion, age, disability, gender identity, sexual orientation, genetic information, protected veteran status or any other basis protected by applicable law. Accordingly, the company will not tolerate unlawful discrimination, sexual harassment or any other types of unlawful harassment. It is also the company's policy to prohibit any and all forms of retaliation against any individual who has complained of harassing or discriminatory conduct or participated in a company or agency investigation into such complaints.

EMPLOYMENT AT WILL

Your employment is not for any fixed period of time and may be terminated "at will," which means with or without cause and without prior notice, by the company. Likewise, you may resign for any reason at any time. No supervisor, manager or any other representative of the company, other than the General Counsel, has the authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to or that alters the at-will nature of your employment. Any such agreement must be in a signed writing between you, or your representative, and the General Counsel of the company.

NOTICE

THIS HANDBOOK IS USED BY THE TIMKEN COMPANY, THE TIMKEN CORPORATION, TIMKEN U.S. CORPORATION AND OTHER U.S. AFFILIATES OF THESE CORPORATIONS. ANY REFERENCES IN THIS HANDBOOK TO "TIMKEN," "COMPANY," "EMPLOYER" OR SIMILAR TERMS, SHALL REFER TO THE CORPORATION THAT IS YOUR EMPLOYER (I.E. PAYS YOUR WAGES OR SALARY).

CONDUCT AND RESPONSIBILITIES

CONDUCT AND RESPONSIBILITIES

INTRODUCTION

Notwithstanding the following, nothing in this associate handbook or any of the company policies set forth in this handbook shall be construed to limit, in any way, your rights under applicable federal, state or local laws, including, but not limited to the National Labor Relations Act.

As a Timken associate, you are expected to conduct yourself in a manner that is at all times consistent with:

- common standards of good citizenship and respect for the rights of others;
- specific standards of conduct and policies of the company;
- the laws and regulations of the various jurisdictions in which we do business.

You should not engage in any conduct or activity that interferes with your own work or that of any other associate or with plant operations. Although no effort is made to list every possible kind of unacceptable conduct, any conduct or activity, even though not forbidden by any published policy or rule, which interferes with the operation of the business, the safety of associates or equipment or is against generally accepted standards of human conduct is grounds for disciplinary action. In addition, associates may be subject to termination if they fail, in the sole discretion and judgment of management, to meet expectations.

This handbook is reviewed on a periodic basis and printed copies may not reflect the most current or complete version of a policy on a given topic. For the full and most current text of company policies, please contact Associate Relations.

Conduct that violates company guidelines and policies may constitute grounds for disciplinary action from reprimand up to and including termination. Consideration will be given to the seriousness of the offense, the associate's previous record, length of service and any other relevant or extenuating circumstances. You may request a review of any disciplinary action you have received. This review should first be with your manager, and if necessary, with your human resources representative. The Timken HelpLine offers an additional option.

This policy does not in any way alter the at-will nature of the employment relationship, which includes the right of either the associate or the company to terminate employment at any time, with or without cause.

COMPLIANCE WITH THESE POLICIES

Although the statements in this section of the handbook pertain to many types of business conduct generally considered to be improper, they do not specifically list every type of conduct that the company would consider unacceptable or detrimental to its operations. Senior managers of the respective business unit, center and/or subsidiary are primarily responsible for the enforcement and compliance of these policies within their organizations. Every associate bears the individual responsibility to fully comply with these policies. Ultimate responsibility for the interpretation of these policies will be held by the General Counsel.

If you have information or knowledge of any act prohibited by these policies, you must promptly report such matter to the senior executive of your business unit, corporate center, division or subsidiary or if unable to report to such senior executive, to the General Counsel by contacting the company's legal department.

STANDARDS OF BUSINESS ETHICS POLICY

The company's Standards of Business Ethics Policy is the foundation of its outstanding reputation for integrity, ethics and respect for the law. This policy contains the moral and ethical standards by which each associate is to conduct the business activities of the company. Every associate needs to understand and adhere to these standards.

Integrity

The business of Timken is to be conducted according to the highest standards of integrity and ethics with due regard for all applicable laws. Each associate is expected to exercise sound judgment in all matters involving business ethics and integrity and to refrain from any conduct that could be questionable on ethical grounds. Any questions can be addressed to supervisors, the office of Ethics and Compliance or the Timken HelpLine.

All associates are expected to be familiar with the laws applicable to their areas of responsibility. If any question arises concerning the applicability of a prevailing law to a

contemplated action, the office of Ethics and Compliance should be consulted. All associates are expected at all times to comply with all applicable laws and regulations and to comply fully with the policies of the company, including those set forth in the associate handbook.

Equal Employment Opportunity

The Timken Company is committed to providing a work environment free from all types of unlawful discrimination and harassment, including sexual harassment and harassment based on an individual's race, religion, color, national origin, ancestry, age, disability, genetic information, gender or gender identity, sexual orientation, protected veteran status or any other basis protected by applicable law. Accordingly, the company will not tolerate unlawful discrimination, sexual harassment or any other types of unlawful harassment. It is also the company's policy to prohibit any and all forms of retaliation against any individual who has complained of harassing or discriminatory conduct or participated in a company or agency investigation into such complaints. Every associate is expected to comply with this policy and the policy against harassment set forth in the associate handbook.

Environmental Responsibility

It is the company's policy to comply with all applicable environmental laws and regulations, and it is every associate's responsibility to ensure such compliance. Every associate should be familiar with the environmental policy statement set forth in the associate handbook.

Health and Safety Responsibility

It is the company's policy to comply with all applicable occupational health and safety laws and regulations. Every associate is responsible to be familiar with the workplace safety and health policy, to follow all company safety rules and procedures, and to wear all personal protective equipment required for their occupation.

Inside Information

Until its release to the public, consistent with federal and state securities laws, material non-public information is considered "inside" information and is governed by these securities laws. These laws prohibit the use of such inside information in trading or recommending securities of the company nor shall such inside information be used to recommend the purchase

or sale of securities of the company to others. Each associate and agent is expected to comply with the company's policy regarding trading in stock as stated in the associate handbook.

Antitrust Laws

Associates should avoid contacts of any kind with competitors and their associates except in those limited situations where contacts are clearly necessary and for a lawful purpose. All associates in sales, product pricing and marketing functions, as well as other associates requiring further information regarding antitrust laws, should obtain the antitrust guidelines from the office of Ethics and Compliance in the Legal Department.

Copyrights

Associates may copy publications that are copyright protected only in certain instances. Those instances are: when permitted by the license agreement; with the written permission of the copyright owner; when it is clearly a "fair use"; when such use otherwise does not constitute unlawful infringement; or otherwise with the approval of legal services. Associates should respect and follow all copyright laws.

Wage & Hour Law

Overtime compensation shall be paid in accordance with all federal, state or local overtime laws, regulations and ordinances. Depending upon business and operational needs, the company may require associates to work overtime. A refusal to work overtime or working unauthorized overtime may result in disciplinary action, up to and including termination.

It is important that your hours are recorded accurately. It is a violation of Timken policy to complete the time sheet of another associate or to allow another associate to complete your time sheet. Likewise, it is a violation of Timken policy to falsify the hours that you work. Violators will be disciplined, up to and including termination, no matter when the violation is discovered.

Export of Goods

Any associate who is involved in the exporting of goods, technical information or software is responsible to ensure that the exporting complies with applicable laws and regulations. Associates requiring further information regarding exporting should contact their unit's export manager or legal services.

Political Affairs

No contributions from company funds are to be made directly or indirectly to any political candidates or political organizations unless permitted by law and approved by the General Counsel. No personal contributions are permitted if reimbursement for such contribution is to be made by the company.

Company associates who contact elected or appointed federal, state, county, city or other officials and associates to promote company products or services and/or to influence legislation, regulations or enforcement activities may be engaging in lobbying and must first contact the office of Government Affairs regarding registration requirements. All lobbying activities, offering testimony or making other major contacts with government personnel should be coordinated with the office of Government Affairs.

Conflicts of Interest

Each associate has the legal duty to carry out his or her responsibilities with the utmost good faith and loyalty to the company. In this regard, associates are required to avoid situations that create actual or potential conflicts in which an associate's actions or loyalties are divided between personal and company interests or between company interests and those of another.

It is impossible to list every situation that may pose an actual or potential conflict of interest in this handbook.

If you have any questions about whether a certain activity, investment, agreement or other interest conflicts with your obligations as a Timken associate, you should bring such questions to the attention of your supervisor/manager or your human resources representative.

A non-exhaustive list of prohibited activities includes, but is not limited to, the following situations:

(1) No associate or dependent family member may: (a) hold a significant financial interest or directorship in a customer, competitor or supplier to the company, or (b) make or receive a loan or credit from any customer, competitor or supplier to the company or from a director, officer or associate of a customer, competitor or supplier to the company, other than in the ordinary course of business and based upon usual terms and conditions, unless the associate

- discloses such interest, directorship, loan or credit in writing to the senior executive of the associate's unit, center, division or subsidiary, or to the General Counsel, and it is subsequently determined that the associate's duties will not require him or her to make decisions that could be influenced by such financial interest, loan or credit;
- (2) Except for his or her duties to be performed for the company, no associate shall perform work for or be a beneficiary or party to an agreement or understanding with, a customer, supplier or competitor of the company where such work, agreement or understanding is related to company products, assignments or services unless such work, agreement or understanding is disclosed in writing to the associate's supervisor and to the Manager Associate and Industrial Relations and it is subsequently determined that such work, agreement or understanding by the associate is not contrary to the interests of the company;
- (3) No gifts, gratuities or entertainment are to be accepted by any associate from any customer, competitor or supplier of goods or services to the company except to the extent they are customary and reasonable in amount and not in consideration for an improper action by the recipient;
- (4) Information regarding the company's strategies, plans, actions, forecasts, sales and earnings, financial condition, new contracts, discoveries, products, processes and similar proprietary and corporate data is considered confidential information and an asset owned solely by the company, until its authorized release to the public by the company. The use of such information for any associate's own benefit or its disclosure to any unauthorized person, whether inside or outside the company, violates the company's interests and is prohibited; or
- (5) Engaging in any other employment or non-work related activities during your company work hours, or using company supplies or equipment in other employment or activities.

If it is determined that any associate has violated this policy, disciplinary action, up to and including termination, will be taken.

Misuse of Assets or Services; Accurate and Complete Records

Using any funds or other assets of the company, or providing any services, for any purpose that is unauthorized by the company or violates the law of any applicable jurisdiction (domestic or foreign) is strictly prohibited. No undisclosed or unrecorded funds or assets of the company shall be established for any purpose.

Associates should ensure that corporate records accurately reflect all transactions. No false or artificial entries shall be made in any company books or records for any reason, and no associate shall engage in any arrangement that results in such a prohibited act.

No payment shall be approved or made with the intention or understanding that it is to be used for any purpose other than that described by the document supporting the payment.

Software Policy

Unauthorized duplication of copyrighted computer software violates the law and is contrary to our organization's standards of conduct. We disapprove of such copying and recognize the following principles as a basis for preventing its occurrences:

- We will neither engage in nor tolerate the making or using of unauthorized software copies under any circumstances.
- (2) We will provide legally acquired software to meet the legitimate software needs in a timely fashion and in sufficient quantities for all our computers.
- (3) We will comply with all license or purchase terms regulating the use of any software we acquire or use.
- (4) We will enforce strong internal controls to prevent the making or using of unauthorized software copies, including effective measures to verify compliance with these standards and appropriate disciplinary measures for violation of these standards.

Improper Influence; Foreign Corrupt Practices Act

No offer of or payment of any gift, loan or gratuity is to be made either directly or indirectly to any business or government entity or any associate of such in exchange for or otherwise in an attempt to procure business for the company. Gifts and entertainment may be used with representatives of customers or potential customers if they are of limited value, are customary in the situation, are legal and their public disclosure would not embarrass the company.

Compliance with the Business Ethics Policy

Although the previous statements pertain to many types of business conduct generally considered to be improper, they do not specifically list every type of conduct that the company would consider unacceptable or detrimental to its operations. All officers and managers of the company and its subsidiaries are responsible for the enforcement of and compliance with this policy and to ensure associates' knowledge and compliance. All recipients of this policy have the responsibility to fully comply with this policy. Ultimate responsibility for the interpretation of this policy will be held by the General Counsel. Any associate having information or knowledge of any unrecorded fund or asset of the company, any violation of law or regulation or of any other act prohibited by this policy shall promptly report such matter to the senior executive of the associate's business unit, division or subsidiary, or if unable to report to such senior executive, to the General Counsel. Conduct that violates this policy will constitute grounds for disciplinary action, from reprimand up to and including termination. This policy does not in any way alter the right of either the associate or the company to terminate employment at any time, with or without cause.

COMPANY RULES

The following is a non-exhaustive list of some typical reasons for disciplinary action up to and including termination, in the discretion of the company. Nothing in this list is intended to restrict, nor should be interpreted as restricting, any associate from exercising his or her statutory rights to organize or to act for their individual or mutual benefit under Section 7 of the National Labor Relations Act or other laws; nor from exercising his or her statutory rights under Title VII of the Civil Rights Act of 1964 or other laws:

Removing, stealing or damaging company property, including records belonging to the company, property of another associate or the property of any other person or organization without authorization.

Falsifying any records, reports, lists, communications or any information pertaining to company employment or benefits.

Using or possessing explosives or weapons on company premises at any time except where it is otherwise expressly permitted under federal and/or state law.

Using, possessing, transporting, selling or promoting the use of any controlled substance as defined in this handbook on company premises at any time.

Using, possessing, transporting, selling or promoting the use of alcohol on company premises at any time, without appropriate authorization.

Reporting for work or entering the plant or office under the influence of alcohol or any controlled substance as defined in this handbook.

Fighting with or striking another associate.

Threatening violence, intimidating or unlawfully harassing, as defined in the "Harassment and Discrimination Policy" set forth in this handbook, another associate or business visitor.

Professional or business conduct that violates the "Standards of Business Ethics" set forth in this handbook.

Using abusive, harassing, profane or otherwise similarly unacceptable language toward another associate or supervisor.

Refusing to follow instructions or orders of supervision or willful neglect of duty.

Accessing company buildings, facilities and/or working areas outside scheduled work hours except in performance of an associate's normal work duties or as specifically directed by management, not including exterior areas of the premises such as exits or parking lots.

Leaving your job assignment, department, the plant, or company premises during a working shift without authorization.

Violation of the Solicitation/Distribution policy in this handbook.

Gambling or participating in any way in a lottery or any other game of chance on company premises at any time.

Posting or removing notices or signs without specific approval of the security department, human resources department, or their designated representative.

Parking motor vehicles on company premises improperly or in an unauthorized area.

Unauthorized use of cameras, tape recorders, cellular telephones and or any other recording devices to record any confidential, proprietary or Sensitive Company Information as defined in this Handbook; or any use of recording devices in restrooms or locker room areas.

Unauthorized use of personal electronic devices or electrical appliances during working time or in working areas on company premises.

Violating or disregarding good housekeeping practices, safety practices, fire, plant, plant protection practices or other work rules or regulations.

Willful, careless or negligent use of company property.

Loafing, wasting working time, horseplay, taking an unauthorized break or sleeping on company premises.

Performing improperly on the job, failing to meet production requirements, or causing other associates to perform improperly on their jobs or fail to meet production requirements.

Performing personal work during scheduled working time.

Theft, misappropriation, or misuse of company equipment, goods, materials, or services; or unauthorized use of company equipment, goods, materials, or services.

Having unauthorized or repeated or excessive tardiness or absenteeism.

Failing to notify the company when you may be absent or late or refusing to explain the reasons for absence.

Any violation of federal, state or local laws.

Any violation of company policy, work rules, standards or expectations.

Any other act or omission that, in Timken's discretion and judgment, warrants disciplinary action.

This basic outline of conduct and responsibility is provided solely as a non-exhaustive general guide for associate behavior. It does not list every example of behavior which the company believes may warrant discipline. In addition, any behavior prohibited elsewhere in this handbook or by any other policy statement of the company may subject an associate to disciplinary action. This policy does not alter or modify, in any manner whatsoever, the at-will employment relationship between Timken and its associates.

DRUG AND ALCOHOL ABUSE

The company recognizes that our associates are a valuable resource, and their health and safety is a significant concern. Drug and alcohol abuse imperils the health, safety and wellbeing of associates. The company has a policy of maintaining a drug-free workplace and strictly prohibits the unlawful manufacture, distribution, dispensation, possession or use of controlled substances or alcohol in the workplace. It is the company's policy to comply with The Federal Drug-Free Workplace Act. Associates are subject to discipline up to and including termination for violating this prohibition or other prohibitions relating to drugs and alcohol.

In locations where a random or other drug screening policy is in place, associates will be expected to abide by such policies. The company promotes education and awareness of the dangers of substance abuse and will encourage and assist associates with a drug and/or alcohol problem in seeking professional diagnosis, treatment and rehabilitation.

Unless otherwise required by applicable law, the use of marijuana for medical and/or recreational purposes, even if permitted by state law, regulation or ordinance, will not be considered an acceptable explanation for a confirmed positive laboratory report for marijuana and will be reported by the Medical Review Officer (MRO) as a verified positive drug test for marijuana.

Definitions

The following are definitions for purposes of this policy:

- "Company business" means on company premises at any time; in company-supplied vehicles at any location at any time; during working hours at any location at any time; or while representing the company in any official capacity.
- "Controlled substances" means the drugs and other substances listed in schedules I through V of the Controlled Substances Act and further defined by regulations under the Act. Controlled substances include, but are not limited to marijuana, opiates, cannabinoids, amphetamines, depressants, stimulants, hallucinogens and narcotics, but they do not include "legal drugs" as defined below.
- "Alcohol" means the intoxication agent in beverage alcohol, ethyl alcohol, or other low molecular weight alcohols, including methyl and isopropyl alcohol. References to use or possession of alcohol include use or possession of any beverage, mixture or preparation containing alcohol, including but not limited to distilled spirits, wine and malt beverages.
- "Legal drugs" means prescription or over-the-counter drugs that are legally obtained by the associate but does not include marijuana.

Prohibitions

The following is a non-exhaustive list of prohibited activities under this policy:

- 1. The unauthorized use or possession or any manufacture, storage, distribution, dispensation or sale of a controlled substance or alcohol while on company premises or company business;
- 2. The improper use of legal drugs, i.e. the use of the drugs for any purpose other than that for which they were intended, including but not limited to the unauthorized use or possession or any unauthorized manufacture, storage, distribution, dispensation or sale of a legal drug;
- 3. Being under the influence of a controlled substance or alcohol while on company premises or company

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- business, including testing positive for a controlled substance or alcohol; and
- 4. Testing positive for a controlled substance or alcohol or otherwise violating the drug and alcohol policy.

Effect on Workers' Compensation Eligibility

A positive test or refusal/failure to submit to testing following an accident on company business may affect an associate's eligibility for workers' compensation benefits, subject to applicable state law.

Counseling, Rehabilitation and Assistance

You are encouraged to notify your manager/supervisor, human resources or a medical services representative if you have an alcohol and/or drug-related problem.

For information about the availability of community drug and alcohol abuse counseling, rehabilitation and assistance programs, please contact a medical services representative.

If there is reasonable cause to suspect that an associate has violated this Drug and Alcohol Abuse policy, the associate may be subject to drug and/or alcohol testing procedures.

Confidentiality

It is recognized that to effectively assist associates with drug and/or alcohol problems, it may be necessary to consult with others. Throughout the process, confidentiality of the information obtained will be maintained to the extent possible.

Return to Work

Associates, who undergo rehabilitation, have successfully completed a rehabilitation program and test negative for drug use or alcohol dependency, will be evaluated for return to work by a company medical representative. Thereafter, unannounced periodic follow-up testing for alcohol and/or controlled substances may be scheduled.

Disciplinary Actions/Conditions of Employment

The sale, use, possession or manufacture of any controlled substance or alcohol or other drug on company business in violation of this policy will result in disciplinary action up to and including immediate termination of employment.

Testing positive following the first rehabilitation for unauthorized drug and/or alcohol abuse or dependency—or future violations of the drug and alcohol policy—will result in immediate termination of employment.

Failure or refusal to submit to controlled substances and/ or alcohol testing in accordance with company policy may result in disciplinary action up to and including immediate termination of employment.

Failure to notify the company of any criminal drug statute conviction occurring on company premises or when conducting company business as soon as possible, but no later than five (5) days after such conviction, may result in disciplinary action up to and including immediate termination of employment.

You must abide by the terms of this policy, and if you do not, it may result in disciplinary action up to and including termination.

GLOBAL INFORMATION SECURITY POLICY

To view the full policy that is published in Global Information Security & Compliance, <u>click here</u>. http://timkenetprod.inside.tkr/content/Organization/CorporateCenters/IT/InfoSec/Pages/default.aspx

Purpose

Information and associated information technology resources are essential to the day-to-day operations of the company, including manufacturing, shipping, customer service, research, inventory control, payroll, financial records, and others. The purpose of this Global Information Security Policy is to provide a framework of governance for the Information Security Program and its supporting policies and to enable those assigned to carry out its mandates.

Scope

This mandatory policy applies to all associates of the company and its subsidiaries. This policy also encompasses any agreement you may otherwise be bound by in relation to the protection of certain Timken or third-party information, such as confidentiality or non-disclosure agreement.

This policy applies to all information from the time that it is created to the time of its disposal, as well as during its processing, communication, distribution and storage. All

associated information technologies, such as computers, data storage devices, communications devices, and the like are also covered.

Policy Statement

General Policy: Timken associates, contingents and relevant Third Parties are responsible for protecting the Confidentiality, Integrity and Availability of Information owned by, or entrusted to, Timken, and shall be compliant with applicable legal and contractual requirements. Users shall refrain from conduct that could expose information and related assets to misuse or loss.

Information Security Program: Management shall implement a governing framework establishing an Information Security Program based around mandatory policies and processes to guide how the program shall be structured and operate. The program shall produce a written Information Security Plan which is reviewed, updated, and approved on a regular basis.

Policy Management and Communication: As needed, additional policies to support Information Security shall be created. Upon policy creation, and periodically thereafter, or after any major changes to a relevant environment, policies shall be reviewed and approved by management or a designated governing body. Policies shall be communicated to associates, contingents, and relevant Third Parties upon hire or at the beginning of the business relationship and shall be made available on a regular basis thereafter. Associates shall acknowledge that they have read, understand, and agree to comply with this Global Information Security Policy and other related policies.

Information Security Roles and Responsibilities:

Information Security roles and responsibilities shall be defined, documented, and delegated to representatives from relevant parts of the organization. Company management shall support the Information Security Program by providing clear direction and level of acceptable risk, acknowledging information security responsibilities, and facilitating the implementation of approved policies, standards, and controls. Contact with relevant authorities, special interest groups, and other security organizations shall be maintained by those holding a responsibility for the Information Security Program.

Policy Violations

Violations of this policy may result in disciplinary action, up to and including termination, for associates. For non-associates, violations can result in contract termination and other remedies as allowed by contract or law.

ELECTRONIC COMMUNICATIONS POLICY

To view the full policy that is published in Global Information Security & Compliance, <u>click here</u>. http://timkenetprod.inside.tkr/content/Organization/CorporateCenters/IT/InfoSec/Pages/default.aspx

<u>Purpose</u>

The purpose of this Electronic Communications Policy is to give Users clear guidance on the use of Electronic Communications.

Scope

This Policy applies to all Electronic Communications, unless otherwise noted in an applicable jurisdiction-specific/local law addendum.

Policy Statement

General Policy: Like all other data, files, or other information, Electronic Communications that are accessed, created, sent, received, transmitted, stored or processed via Company IT Assets are Company property. Company Electronic Communications are company property whether accessed, created, sent, received, transmitted, stored or processed via Company IT Assets or Authorized Devices.

Company Right to Monitor and Access: All Electronic Communications that are accessed, created, sent, received, transmitted, stored, or processed on Company IT Assets, whether personal or business, and whether in final, draft, or deleted form, are not considered private, despite any contrary designation. The company reserves the right to monitor, access, edit, discard, preserve, divert, divulge and otherwise manage or use all Electronic Communications on Company IT Assets, whether personal or business, and whether in final, draft, or deleted form, at any time and without notice in order to respond to subpoenas and court orders, to otherwise comply with the law, to investigate complaints and allegations, to prevent harassing or threatening messages, to enforce this Policy, to enforce other policies of the company, for security

checks, for maintenance purposes, or as the company otherwise determines is necessary in its sole determination. Additionally, public websites, including social media sites, are subject to monitoring by the company at any time and without notice. The company may take possession of and search any Company Devices or Authorized Devices used to access Company IT Systems or generate Company Electronic Communications in order to facilitate such rights, and any User who fails to comply with a request by the Company for such search will be deemed in violation of this policy. If possible illegal activity is detected, Electronic Communications that are accessed, created, sent, received, transmitted, stored, or processed on Company IT Assets or Authorized Devices may be provided to law enforcement.

Disclosure and Interception of Electronic

Communications: Users may not intercept or disclose, or assist in intercepting or disclosing, Electronic Communications of another User that are accessed, created, sent, received, transmitted, stored, or processed on Company IT Assets unless specifically authorized by the Company or such other User.

Electronic Communications Content: The following standards apply to all Electronic Communications accessed, created, sent, received, transmitted, stored, or processed on Company IT Assets, whether personal or business, and all Company Electronic Communications:

- The Electronic Communication must not violate any law.
- Users should exercise professionalism and judgment, and take the most prudent action possible, complying with this and all other company policies including, for example, the Standards of Business Ethics, the company's solicitation and distribution policy and the company's policy against harassment and discrimination. Electronic Communications should never contain any defamatory, sexually oriented, obscene, harassing, threatening, illegal or fraudulent language.
- The company logo and trademarks may not be used in any form without explicit prior permission in writing from the communications department, unless otherwise permitted by law.

 Users must comply with policies related to confidentiality, non-disclosure, privileged information and intellectual property protections such as copyright, trademark and fair use laws.

Confidential Information: Company Confidential Information shall not be transmitted via an Electronic Communication unless secured according to standards established by the information technology department, and even then, only to necessary and authorized recipients.

User Identification: The user name, electronic mail address, organizational affiliation and related information included on all Company Electronic Communications and all Electronic Communications that are created, sent, received, transmitted, stored, or processed on Company IT Assets must reflect the actual originator of the communication.

Notwithstanding the foregoing, nothing in this policy shall be construed to limit, in any way, your rights under any applicable federal, state or local laws, including, but not limited to the National Labor Relations Act and your right to organize or engage in protected concerted activity, including the discussion or sharing of information related to wages, hours or other terms and conditions of employment.

Policy Violations

Violations of this Policy may result in disciplinary action, up to and including termination, for associates. For non-associates, violations can result in contract termination and other remedies as allowed by contract or law.

SOCIAL NETWORKING POLICY

To view the full policy that is published in Global Information Security & Compliance, <u>click here</u>. http://timkenetprod.inside.tkr/content/Organization/CorporateCenters/IT/InfoSec/Pages/default.aspx

<u>Purpose</u>

The company recognizes that many Users access and communicate via social media. The purpose of this Social Networking Policy is to give Users clear guidance on their social networking activities via Company IT assets or otherwise.

"Sensitive Company Information" means information relating to the company that is confidential, proprietary or protected by law from disclosure. Sensitive company information includes, for example, project plans, product designs, technical drawings, work product information, confidential company financial information, business strategies, customers, potential customers, agents, suppliers, company pricing, securities and trade secret information, legally-privileged information, personally identifiable information of customers or associates, or other proprietary information.

Scope

This policy applies to all social networking activities by Users other than as an official representative of the company, whether via Company IT Assets, Authorized Devices, or Users' own personal devices, unless otherwise noted in an applicable jurisdiction-specific / local law addendum. Social networking activities conducted as an official representative of the company are covered by the Company's Social Media Use by Authorized Associates Policy.

Social networking activities include, for example, the creation or distribution of information via blogs, message boards, communities, wikis, vlogs, posts, discussions, and sites such as Orkut, MySpace, YouTube, Facebook, Instagram, Snapchat, LinkedIn, Wikipedia, Flickr, Groupon, Foursquare, Second Life, Twitter, Yammer, RenRen and the like. Social networking activities also include use of internal social media on the Company's intranet, for example My TimkeNet.

Policy Statement

General Policy: In the company's sole discretion, certain social media may be made accessible from company IT assets. In limited circumstances, certain associates may be assigned to officially sanctioned projects for the company that have been approved by their manager and the manager of information security and compliance and may be granted access to social networking sites that are otherwise made inaccessible to users. Such associates must comply with the company's Social Media Use by Authorized Associates Policy. This policy is not intended to discourage your social networking activities nor is it intended to restrict any activity authorized by law.

Jurisdiction-Specific or Local Law Requirements: This policy is subject to applicable local law restrictions, which may vary from the provisions contained herein. Contact Associate Relations for questions about applicability in your local jurisdiction.

Company Right to Monitor and Access: Social networking activities via company IT assets, including the social media content and communications accessed, created, sent, received, transmitted or stored on company IT assets, are subject to the provisions of the Electronic Communications Policy and all other company policies. This means that social networking activities and communications accessed, created, sent, received, transmitted, stored or processed on company IT assets, whether business or personal, and whether in final, draft, or deleted form, are company property, are not considered private and are subject to monitoring by the company at any time and without notice. Additionally, public websites, including social media sites, are subject to monitoring by the company at any time and without notice. If possible illegal activity is detected, social media activities and communications that are accessed, created, sent, received, transmitted, stored or processed on company IT assets may be provided to law enforcement.

Social Networking Content: The following guidelines apply to users when engaging in social networking activities:

- Social networking activities must not interfere with work commitments or otherwise violate the company's policies.
- When engaging in social networking activities
 via company IT assets, users should exercise
 professionalism and judgment, and take the most
 prudent action possible, complying with this and
 all other applicable company policies including,
 for example, the Standards of Business Ethics,
 the company's solicitation and distribution policy
 and the company's policy against harassment and
 discrimination. Social networking activities via company
 IT assets should not contain any defamatory, sexually
 oriented, obscene, harassing, threatening, illegal or
 fraudulent language.
- Like any other communication, social networking activities are subject to the same confidentiality, nondisclosure, privileged-information and intellectualproperty protection obligations that apply to associates and users generally.
- Users are prohibited from disclosing to or discussing with any unauthorized person any sensitive company information without the prior, express written consent of an authorized representative of the company, such as the legal department. Special care must be taken

- to protect company confidential information and to protect the security of the company's customers' trade secrets and other proprietary information.
- Copyright, trademark and other intellectual property laws apply to social networking activities. Users must respect and follow all trademark, copyright and intellectual property laws when engaging in social networking activities via company IT assets.
- All inquiries from the media about the company's current and potential products, agents, customers or competitors, must be referred without response to the communications department.
- Notwithstanding the foregoing, nothing in this policy shall be construed to limit, in any way, your rights under any applicable federal, state or local laws, including, but not limited to the National Labor Relations Act.

Representing the Company: No one may act as a representative of the company in social networking activities, including on social media sites, unless prior authorization has been obtained from the communications department. When communicating via social media as an authorized representative of the company, associates must comply with the company's policy on Social Media Use by Authorized Associates.

User Identification: Statements made during social networking activities by users could be attributed to the company and may be regulated by law, such as the Federal Trade Commission's regulations on endorsements and testimonials, due to the users' relationship with the company. Accordingly, when discussing the company, its products, customers, competitors or their products in any forum, including via social media, in a manner that could reasonably be attributed to the company, users who are not authorized to act as a representative of the company must (1) identify their relationship to the company; and (2) clearly state that the views expressed are their own and not those of the company.

Policy Violations

ACCEPTABLE USE OF COMPANY INFORMATION TECHNOLOGY ASSETS

To view the full policy that is published in Global Information Security & Compliance, <u>click here</u>. http://timkenetprod.inside.tkr/content/Organization/CorporateCenters/IT/InfoSec/Pages/default.aspx

Purpose

Information technology assets are essential business tools for the company. The purpose of this Acceptable Use of Company Information Technology ("IT") Assets Policy (the "Policy") is to give Users clear guidance on the use of Company IT Assets.

Scope

This mandatory Policy applies to all use of Company IT Assets, whether via Company Devices, Authorized Devices, or otherwise, unless otherwise noted in an applicable jurisdiction- specific/local law addendum.

Policy Statement

General Policy: Company IT Assets are to be used for the primary purpose of supporting company business. These tools are in place to facilitate Users' ability to do their jobs efficiently and productively. Use of Company IT Assets must be in compliance with this and all other Company policies including, for example, the Standards of Business Ethics policy, the company's solicitation and distribution policy and the company's policy against harassment and discrimination. Use of Authorized Devices is subject to written approval by the company. The company reserves the right, in its sole discretion, to permit Authorized Devices to be used to access Company IT Assets. The company also retains the right to discontinue such access or use at any time for any reason, without prior notice.

Company Right to Monitor and Access: All data, files, communications, or other information that are accessed, created, sent, received, transmitted, stored, or processed on Company IT Assets, whether personal or business, and whether in final, draft, or deleted form, are not considered private, despite any contrary designation. The company reserves the right to monitor, access, edit, discard, preserve, divert, divulge and otherwise manage or use all data, files, communications, or other information, whether personal or

business related and whether in final, draft, or deleted form, accessed, created, sent, received, transmitted, stored, or processed on any and all Company IT Assets, at any time and without notice in order to respond to subpoenas and court orders, to otherwise comply with the law, to investigate complaints and allegations, to prevent harassing or threatening messages, to enforce this Policy, to enforce other policies of the company, for security checks, for maintenance purposes, or as the company otherwise determines is necessary in its sole discretion. Additionally, public websites, including social media sites, are subject to monitoring by the company at any time and without notice. If possible illegal activity is detected, data, files, communications, or other information that are accessed, created, sent, received, transmitted, stored, or processed on Company IT Assets may be provided to law enforcement.

Data Privacy Legislation: In some countries, the collection, storage, use and disclosure of personal information (employee, customer, or otherwise), and the transfer of personal information to other countries, may be subject to privacy legislation and restrictions. As the scope of regulated personal information varies by country, contact your manager or the legal department if you have questions regarding the protection of personal information or the transfer of personal information to another country.

Personal Use of Company IT Assets: Incidental personal use of Company IT Assets is permitted so long as such use does not interfere with company business, relate to a personal business venture, or otherwise violate this policy or any other policy of the company and it is brief, limited in volume/number, not disruptive of any Company IT Systems' function, capacity or throughput or the primary intended uses of such resources, not disruptive of the work environment or productivity, and in compliance with this and all other company policies including, for example, the company's solicitation and distribution policy and the company's policy against harassment and discrimination. The company reserves both the right and the sole discretion to determine when personal use of Company IT Assets exceeds an incidental level, and reserves the right and sole discretion to withdraw permission for personal use of Company IT Assets at any time and for any reason.

Security Obligations: Use of Company IT Assets is subject to company policies on information security, including, for example, record retention, password policy and standards, electronic communications, internet usage, intranet usage, dial-up or remote access, virus protection and portable device protection. Users must not take any action that would compromise the security of Company IT Assets. This includes the unauthorized release or sharing of passwords and the intentional disabling of any security features of Company IT Assets. See Global Information Security Policy.

Global Guest Wi-Fi Access: The company offered guest Wi-Fi service is intended to be used only for business purposes by company guests/visitors. The company does not guarantee the performance, security or the availability of the service. The guest and Timken Sponsor (Associates, Managers) are solely responsible for any information (e.g. abusive, threatening, obscene, defamatory) or data uploaded, downloaded or otherwise communicated using the company quest Wi-Fi.

Compliance with Laws: Use of Company IT Assets must be in compliance with all laws and regulations. Company IT Assets may not be used for unauthorized download of content or material that infringes the copyright of any person.

Reporting Security Incidents: The company takes seriously any threats – real or suspected – to the security and integrity of Company IT Assets. Users must immediately report any suspected security problem or misuse of Company IT Assets to the appropriate supervisor or by contacting the Manager-Information Security or Information Technology Helpdesk.

Nothing in this policy is intended to restrict, nor should be interpreted as restricting, any associate from exercising his or her statutory rights to organize or to act for their individual or mutual benefit under Section 7 of the National Labor Relations Act or other laws; nor from exercising his or her statutory rights under Title VII of the Civil Rights Act of 1964 or other laws.

Policy Violations

RESTRICTIONS ON SOFTWARE INSTALLATION AND USE POLICY

To view the full policy that is published in Global Information Security & Compliance, <u>click here</u>. http://timkenetprod.inside.tkr/content/Organization/CorporateCenters/IT/InfoSec/Pages/default.aspx

Purpose

The purpose of these Restrictions on Software Installation and Use Policy is to make clear to Users that The Timken Company's position is that software licensing term shall be followed.

This policy supersedes the "Software Code of Ethics."

Scope

This mandatory policy applies to all associates of the company and its subsidiaries. This policy also encompasses any agreement you may otherwise be bound by in relation to the protection of certain Timken or third-party information, such as confidentiality or non-disclosure agreement.

This policy applies to all information from the time that it is created to the time of its disposal, as well as during its processing, communication, distribution and storage. All associated information technologies, such as computers, data storage devices, communications devices, and the like are also covered.

Policy Statement

The Timken Company licenses the use of computer software from outside companies. Associates are expected to comply with license and purchase terms regulating any software acquired or used.

The company shall not tolerate the making or use of unauthorized software copies under any circumstances. The company shall provide software to meet legitimate business needs. Unauthorized copying of this software may be a violation of copyright laws, which could carry civil and criminal penalties for both the company and the associate.

Policy Violations

CLEAR DESK AND CLEAR SCREEN POLICY

To view the full policy that is published in Global Information Security & Compliance, <u>click here</u>. http://timkenetprod.inside.tkr/content/Organization/CorporateCenters/IT/InfoSec/Pages/default.aspx

<u>Purpose</u>

The purpose of this Clear Desk and Clear Screen Policy is to inform Users of their responsibility to secure the Confidential information in their possession or to which they have access.

Scope

This mandatory policy applies to all associates of the company and its subsidiaries. This policy also encompasses any agreement you may otherwise be bound by in relation to the protection of certain Timken or third-party information, such as confidentiality or non-disclosure agreement.

This policy applies to all information from the time that it is created to the time of its disposal, as well as during its processing, communication, distribution and storage. All associated information technologies, such as computers, data storage devices, communications devices, and the like are also covered.

Policy Statement

Associates are required to ensure that confidential information in hardcopy or electronic form is secure in their work area at the end of the day and when they are expected to be gone for an extended period. Computer workstations shall be locked when the workspace is unattended.

Policy Violations

ENVIRONMENTAL, HEALTH AND SAFETY POLICY

We are consistently guided by our core values—ethics and integrity, quality, teamwork and excellence. We embed in this foundation our commitment to work safely and responsibly in every Timken facility and within every Timken operation, protecting our associates, suppliers, customers and the communities where we operate, as well as safeguarding our environmental resources.

We continually improve our environmental, health and safety (EHS) performance, striving to keep Timken workplaces safe and healthy, to care for the environment around us, and to develop sustainable technologies and business practices that contribute to global economic growth and prosperity.

Each 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 of our suppliers.
- Make EHS a priority in our business, as well as in our operations planning and decision making. Our core values of ethics and integrity compel us to do what is right.
- Expect colleagues and contractors to always conduct their activities safely and responsibly; we support them with education and training.
- Diligently identify and assess risks and potential hazards that can impact our EHS performance, then quickly take preventive or corrective action.
- Support environmental sustainability through pollution prevention, waste management, recycling and energy conservation, and create energy-saving innovations in our friction management and power transmission products and services.
- Measure and assess progress toward EHS objectives and communicate this regularly to interested stakeholders.

Around the world, Timken managers accept leadership responsibility for delivering on our EHS objectives, with Timken associates charged to keep their decision making and actions consistent with this policy.

HARASSMENT AND DISCRIMINATION POLICY

Prohibition on Unlawful Harassment and Discrimination

It is the policy of the company to provide a work environment free from all types of unlawful discrimination and harassment, including sexual harassment and harassment based on an individual's race, religion, color, national origin, ancestry, age, disability, genetic information, gender or gender identity, sexual orientation, protected veteran status or any other basis protected by applicable law. Accordingly, the company will not tolerate unlawful discrimination, sexual harassment or any other types of unlawful harassment, whether engaged in by management, other associates or other individuals with whom our associates come into contact as part of their employment.

Unlawful harassment is defined as any verbal or physical conduct, which has the purpose or effect of unreasonably interfering with an associate's work performance or of creating an intimidating, hostile or offensive work environment, or which otherwise adversely affects an associate's employment, when that conduct is based on gender or gender identity, race, color, national origin, ancestry, religion, age, disability, genetic information, sexual orientation, protected veteran status or any other basis protected by applicable law.

Sexual harassment is one form of prohibited harassment. Examples of other prohibited forms of harassment include ethnic slurs, racial "jokes," offensive or derogatory comments, bringing into company facilities (including company computer systems) offensive literature, photographs or other media, any other verbal or physical conduct based on the characteristics described above, if the conduct creates an intimidating, hostile or offensive working environment or interferes with an individual's work performance or employment.

Unlawful harassment does not refer to behavior of a socially acceptable nature. It refers to behavior that is not welcome, is personally offensive, fails to respect the rights of others, lowers morale or interferes with work effectiveness.

You are expected to comply with this policy, and members of management are expected to take appropriate measures to ensure that conduct prohibited by this policy does not occur.

Disciplinary action up to and including termination of employment will be taken against associates who violate this policy. The company retains the right to take action with respect to other inappropriate conduct, even though that conduct may not constitute harassment under this policy.

Sexual Harassment Policy

Sexual harassment is illegal under federal and state law, and the company condemns and prohibits sexual harassment of any associate, customer, client, or person performing services to the company or any other third party interacting with the company.

Sexual harassment includes, but is not limited to:

- Verbal harassment, including but not limited to sexual talk, suggestive jokes, or slurs;
- Physical harassment such as assault, patting, squeezing, rubbing, impeding or blocking movement, or any other physical interference with normal work or movement directed at an individual;
- Non-verbal behavior such as suggestive looks, staring or leering;
- Visual harassment, such as derogatory pictures, posters, calendars, graffiti, cartoons, gestures, objects, screensavers, reading materials, other media and the like (regardless of whether such visual harassment occurs by way of the Internet, email, paper form or any other method of delivery); or
- Unwelcome sexual advances, sexually-oriented remarks or comments, threats of reprisal after a negative response to sexual advances, requests for sexual favors, offers of employment benefits in exchange for sexual favors, particularly under the following non-exhaustive circumstances:
- If the submission to such conduct is made a term or condition of working at the company; or
- If the submission to or rejection of such conduct is the basis for employment decisions; or
- If such conduct unreasonably interferes with the individual's work performance or has the effect of creating an intimidating, hostile or offensive working environment; or
- If such conduct is made a term or condition of doing business with the company.
- Conduct or statements that are not necessarily motivated by sexual attraction or desire but that are directed at an individual because of that person's sex (e.g. if one person viciously yells at or otherwise mistreats or demeans persons of one sex, but not the other).

Furthermore, associates must be aware that sexual harassment can involve males or females being harassed by members of the opposite or same sex. Although sexual harassment often involves a person in a greater position of authority as the harasser, individuals in positions of lesser or equal authority also can be found responsible and individually liable for engaging in unlawful harassment. Consensual sexual or romantic relationships where one associate has supervisory authority over the other associate are strongly discouraged.

Harassment and Discrimination Reporting Policy

Timken takes an affirmative role in protecting its associates from unlawful discrimination and unlawful harassment. If you believe that you have been the subject of unlawful harassment, as prohibited by this policy, you must report the situation immediately to one of the following persons:

- Your supervisor;
- Your manager:
- Human resources representative for your facility;
- · Human resources manager for your business unit; or
- A corporate human resources specialist.

If you need help identifying or contacting these persons or if you are dissatisfied with the response to your report, contact The Timken Helpline (1-800-846-5363 or www.timkenhelpline.com).

The company will fully and effectively review and, if necessary, investigate the facts and circumstances of your complaint. Your identity will be held confidential to the greatest extent possible. However, in order to conduct an effective investigation and take proper corrective measures to stop the unlawful conduct, the company may need to disclose certain sensitive information on a need-to-know basis. Therefore, the company cannot guarantee complete confidentiality or privacy in connection with such a complaint.

At the conclusion of the investigation, the company will take appropriate action as indicated by the results of the investigation, including taking all corrective and remedial action necessary to end any unlawful harassment that may have occurred. You will be informed after appropriate action has been taken.

Retaliation Statement

Any associate who attempts to engage in, or actually engages in, retaliation against: (1) an associate or any other person making a good faith complaint of unlawful discrimination or unlawful harassment or (2) any individual who participates in an investigation of unlawful discrimination or unlawful harassment, will be subject to disciplinary action, up to and including termination.

Examples of specific acts of retaliation include, <u>but are not</u> limited to:

- Disciplining any associate because that associate has complained of harassing or discriminatory conduct or has participated in a company or agency investigation into such complaints.
- 2. Engaging in conduct that would deter associates from reporting harassment or discrimination.
- Intentionally pressuring, falsely denying or otherwise covering or attempting to cover up such conduct as previously described.

INFORMATION SECURITY POLICY

Introduction

Information and associated information technology resources are absolutely essential to the day-to-day operations of the company, including but not limited to, manufacturing, shipping, customer service, research, inventory control and financial records. It is important for each associate to follow procedures outlined in this policy and take actions necessary to prevent unauthorized access to valuable information on paper documents, computer files, voicemail, e-mail or other mediums. Without proper information protection, the company could suffer a loss of customer confidence, market share, competitive advantage and, ultimately, jobs.

Principles

Information, including but not limited to the company's strategies, plans, actions, forecasts, sales and earnings, financial condition, contractual relationships, research, discoveries, products, services, processes, suppliers/vendors, customers and similar proprietary and corporate data, regardless of the form or medium which contains

such information, is considered an asset owned solely by the company. In many cases, such information constitutes confidential information or trade secrets that may cause severe damage to the company if disclosed to any third party. In addition, the company has in its possession the information of third parties and may, in some instances, have a legal obligation to protect that information as specified by contracts, licensing or other agreements or laws.

Valuable information in all forms must be protected against unauthorized access, use, disclosure, alteration or destruction. Information security control procedures must be in place in all areas to ensure the confidentiality, integrity and availability of important information. It is every associate's responsibility to understand and to exert the utmost duty of care to comply with this policy in a manner consistent with these principles.

Scope

This policy applies to all associates of the company and its subsidiaries. It is intended to supplement, but not replace, related policies, including but not limited to the Standards of Business Ethics Policy, Electronic Communications Policy and Visitor Policy. This policy also encompasses any agreement you may otherwise be bound by in relation to the protection of certain Timken or third-party information, such as a confidentiality or non-disclosure agreement.

This policy covers all company information, in any form and in any medium, including, but not limited to, paper documents, computer files, multimedia, facsimile, magnetic tapes, voice mail, wireless phones, PDAs, CDs, electronic mail, flash drives, microfiche, software, video/audio teleconferencing and verbal communications. This policy applies to information from the time that it is created to the time of its disposal, as well as during its processing, communication, distribution and storage. All associated information technologies, such as computers, data storage devices, communications devices, are also covered.

Responsibilities

All associates of the company are required to protect information in accordance with this policy. Each associate is expected to exercise sound judgment in all matters involving information and to refrain from any conduct that could expose the assets of the company to misuse or loss. Each business and department is responsible to determine in coordination with Information Security and Compliance, Corporate Security,

Global Information Services, Legal, Benefits, Medical, and Internal Audit, proper levels of protection for its information and the information under its control and to apply necessary information security procedures to protect that information.

Information Security Procedures

The following outlines the procedures and practices for associates to protect information that they use or control.

The company reserves the right to monitor and audit the use of its information and associated resources to ensure that needed levels of information security are being met. All associates are permitted to use information and associated information technology resources subject to the following conditions:

- Use information and communications systems only as authorized for company business or other approved uses and only as is necessary and authorized in relation to your task, i.e. disclose certain information to others, even other Timken personnel, on a "needto-know" basis.
- Comply with all applicable Timken or third-party requirements, such as confidentiality or nondisclosure agreements, to protect the integrity, security and value of Timken information and/ or those third parties who entrust us with their own information. Each associate is responsible for determining if there are any special obligations unique to his/her job responsibilities.
- If you have any question as to whether you are governed by such an agreement or the terms and obligations of such an agreement, you should contact your immediate supervisor or your human resources representative to resolve those questions.
- Ensure that all outside parties (e.g. contractors, suppliers, consultants, etc.) sign, prior to the release of confidential or proprietary company information, agreements which impose on the receiving party an obligation to protect company information and restrict its use as directed by The Timken Company.
- Protect information in all forms (paper, e-mail, flash drives, computer files, CDs, etc.) and information technology resources (e.g. communication systems, software, etc.) from theft, tampering, misuse, malicious software (e.g. computer viruses), destruction and loss.

- Provide appropriate physical security to prevent unauthorized access to information and related equipment and software that need protection from theft, unauthorized disclosure, damage or destruction.
- This includes, but is not limited to: the wearing of security/identification badges in accordance with company policy wherever applicable; avoiding leaving documents or information unattended, particularly in areas of public access; locking offices, rooms, desks, drawers and file cabinets; disposing of information in accordance with established retention/disposal schedules; clearly marking documents or information as "confidential;" and immediately retrieving information on fax machines, copy machines and printers.
- Understand the security features available using the various types of media and technologies to ensure that the required security is available and used.
- Use only company provided equipment, devices and software (e.g. Personal Computers, wireless cards, anti- virus software, client firewalls, PDAs) when connected to The Timken Company network locally or remotely. Any exceptions must be explicitly authorized by Information Security and Compliance on a caseby-case basis.
- Do not attempt to circumvent controls intended to protect information and related resources. Do not attempt to exploit vulnerabilities or deficiencies in security features. All vulnerabilities and deficiencies should be promptly reported to Information Security and Compliance.
- Treat passwords and other system access information (e.g. Personal Identification Numbers, long distance access codes, dial-up access telephone numbers) as confidential. Attempts to learn the passwords of others, discover unprotected files or to decode encrypted files are specifically prohibited, unless authorized to do so.
- Do not share User IDs assigned for individual use and do not allow the unattended sharing of your PC or logged on applications or systems. This applies to all persons, including computer support and others who have special privileges to administer servers, applications and other computer resources.

- Do not leave your workstation, personal computer or terminal unattended for unreasonable periods of time without first logging off, disconnecting or using some other method (e.g. password-protected screensaver) so that others cannot access network resources using your User ID. All personal computers must be protected with a password-protected screensaver that is automatically displayed after ten minutes or less of inactivity.
- Persons having access to information for which protection is mandated by law, regulation or Timken policy (e.g. medical information) must always lock their workstation, personal computer or terminal when it is left unattended for any period of time.
 Such individuals should not rely upon the passwordprotected screensaver.
- Do not use software that is designed to cause unauthorized destruction of data, provide unauthorized access or disrupt computing processes in any way. The use of viruses, worms or any other invasive software is expressly forbidden. Virus scanning software should be used on a regular basis to scan for signs of malicious software.
- Do not use monitoring hardware and/or software (e.g. sniffers, network scanners) or special privileges, such as those required to provide computer support or administer servers and application, except as explicitly authorized by Information Security and Compliance.
- Obtain client permission and acceptance for all PC remote control sessions. The use of "stealth" mode to gain access without the user's explicit acceptance is expressly prohibited. Any exceptions must be approved by Information Security and Compliance.
- Dispose of hardware, software and computer-related supplies and documentation in a way which does not compromise security or result in the accidental disclosure of company-sensitive material.
- Respect the intellectual property rights of all patents, copyrights, inventions, trade secrets, computer software or other intellectual property, and safeguard these rights as required by law.
- Use the company's internet connections and resources, if authorized to do so, in accordance

with the Acceptable Use of Company Information Technology Assets Policy (refer to the Global Information Security and Compliance or by clicking here. [http://timkenetprod.inside.tkr/content/ Organization/CorporateCenters/IT/InfoSec/Pages/ default.aspx]). Do not use the company's internet connections or resources for inappropriate or unauthorized use, such as connecting with websites that contain sexually explicit, racist, violent or other offensive material.

Notwithstanding the foregoing, nothing in this policy shall be construed to limit, in any way, your rights under any applicable federal, state or local laws, including, but not limited to the National Labor Relations Act and your right to organize or engage in protected concerted activity, including the discussion or sharing of information related to wages, hours, or other terms and conditions of employment.

Compliance

All associates of the company are expected to comply with this policy and associated information security directives. Compliance with policies and standards is mandatory. Security policies must be applied so that security measures fully comply with the laws and regulations applicable to the specific location. Penalties for non-compliance may include disciplinary action up to and including termination. Additionally, certain breaches of this policy may subject associates to civil and criminal penalties depending upon the nature of the offense.

INTERNET SECURITY POLICY

The Internet has been a useful tool for associates for many years. It has provided information and communications that have assisted many associates in the performance of their job functions. It has become part of our everyday life at work and home.

As with other company systems and equipment, the internet is to be used as authorized for company business and other approved uses, in accordance with company policy including its policy on the Acceptable Use of Company Information Technology Assets. The company depends upon the good judgment of its associates to use the internet in accordance with Timken policies and instructions, as well as any applicable laws and regulations. Compliance is required regardless of whether Timken has implemented technical

methods to block prohibited uses. At any time and without prior notice, company management reserves the right to examine electronic mail messages, files on personal computers, web browser cache files, web browser bookmarks and other information stored on or passing through company computers. The review access is used to assure compliance with internal policies, assist with internal investigations, and is required for the management of company information systems.

If you are authorized to use the internet, use it according to this policy (refer to the Global Information Security and Compliance or by clicking here. [http://timkenetprod.inside.tkr/content/Organization/CorporateCenters/IT/InfoSec/Pages/default.aspx]). Do not use the company's internet connections or resources for inappropriate or unauthorized use, such as connecting with websites that contain sexually explicit, racist, violent or other similarly inappropriate material. If you use Timken internet access and equipment for inappropriate or unauthorized uses, it is a violation of company policy and may result in discipline up to and including termination.

Company Right to Monitor and Access

In order to ensure the company's electronic communications systems are being utilized for lawful and acceptable uses, the company reserves the right to access, intercept, monitor, copy, review and download any communications or files you create or maintain on these systems, including but not limited to monitoring chat groups, blogs and news groups, reviewing material downloaded or uploaded by associates, reviewing e- mail and voicemail sent and received by associates, and reviewing associates' access and use of the internet. As a condition of access to these systems, associates waive any right to privacy in anything they create, store, send or receive on company electronic communications systems. Therefore, you should not expect that any information sent, received or stored on these electronic communications systems is private or confidential in any manner whatsoever.

As set forth above, users must recognize that their e-mail use, access to the internet and access and use of all electronic communications systems provided to them by the company are not confidential in nature. Therefore, associates must exercise caution and discretion in their communications and treat all e-mail and other communications and uses as if they were being disclosed to other individuals. Associates must notify management of unsolicited, offensive materials received by any associate on any of these electronic communications systems.

Notwithstanding the foregoing, nothing in this policy shall be construed to limit, in any way, your rights under any applicable federal, state or local laws, including, but not limited to the National Labor Relations Act and your right to organize or engage in protected concerted activity, including the discussion or sharing of information related to wages, hours or other terms and conditions of employment.

Privacy Legislation

In some countries, the collection, storage, use and disclosure of personal information, and the transfer of personal and/ or customer information to other countries, may be subject to privacy legislation and restrictions. Please contact your manager/supervisor or legal services if you have questions regarding the protection of personal information or the transfer of personal information to another country.

Policy Violations

Violations of this policy can result in disciplinary action, up to and including termination, for associates. For non-associates, violations can result in contract termination and other remedies as allowed by contract and/or law. Failure by the company to previously pursue any act which a violation of this policy is (or otherwise tolerate such violation) prior to the effective date, set forth above, is not a waiver of the company's right to pursue and discipline a user for a violation of this policy after the effective date.

Ouestions

Questions regarding this policy should be directed to Legal Services.

SECURITY INCIDENT REPORTING

The company takes seriously any threats – real or suspected – to the security and integrity of company property, including protected information. Associates must immediately report all actual or suspected instances of unauthorized access to protected information or other company property; any inappropriate use, disclosure, alteration or destruction, as well as potential threats (e.g. hackers, computer viruses, fire, high winds, etc.) to protected information or other company property; obvious information security control weaknesses; or any theft or loss of protected information or other company property.

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Such reports should be made to the manager/supervisor of the area, Information Security and Compliance and to the appropriate local security department. If anonymity is required, associates may call The Timken HelpLine at 1-800- 846-5363, or a web report can be submitted at www.timkenhelpline.com.

If the incident involves immediate loss of corporate information or property or danger to human life due to hazards, weather, fire or natural disaster, the corporate or the appropriate local security department must be contacted. If you require additional information or if you have any questions or suggestions regarding this policy, please contact Security Services at (234) 262-2100 or vnet 220-2100.

TRADING IN STOCK

There are two versions of this statement of policy. This version is for distribution to all Timken salaried and hourly associates. A more stringent policy is distributed to executives who are more likely to have access to material, non-public information.

<u>Use and Disclosure of Material, Non-Public Information</u> Restricted

In the course of your employment at The Timken Company, you may have access to material, non-public information regarding Timken, its subsidiaries, its customers, its prospective customers or other individuals and/or companies. This material, non-public information may include matters about the company's financial condition, its strategic plans (including acquisitions) or other important events that could affect the market price of the company's securities. All such information must be kept confidential and not disclosed, except as may be necessary in the performance of your specific job duties.

This policy is designed to make associates more fully aware of the prohibitions against improper use and disclosure of material, non-public information. It applies to all stock or security trades consummated by associates, whether in company stock and securities, or stock and securities of customers, suppliers or others.

Examples of Material, Non-Public Information

In general, information is "non-public" until it is publicly disseminated, which can occur by the issuance of a press release, disclosure in a document filed with the SEC or through a public Web cast.

Non-public information is generally deemed to be material if a reasonable investor would consider it important or significant in a decision to buy, hold or sell stock or securities. Although the materiality of information may vary depending on the circumstances of each case, the following information about a company is almost always considered material:

- · Earnings, dividends or other financial information;
- Proposed acquisitions, divestitures, mergers, tender offers, joint ventures and takeovers;
- · Proposed new security issues;
- Substantial purchases, sales, borrowings or other similar corporate action;
- · Liquidity or cash problems;
- Pending discoveries or new product launches;
- · Obtaining or losing a major contract or customer;
- Information concerning significant changes in the business or personal lives of senior-level management;
- The existence of and risks associated with significant threatened or pending litigation; and
- Significant regulatory proceedings and governmental investigations involving the company.

This list is not exhaustive and depending upon the circumstances, other information can be material. You should always treat information as material if you have any reason to believe that it may be important. When in doubt, call the Corporate Secretary.

Transactions Involving Company Stock—Prohibited Acts

Trading on Inside Information Prohibited

All associates are prohibited, by law, from trading (buying or selling) stock or securities of any company while the associate is in possession of material, non-public information about that company. This prohibition applies regardless of the dollar amount of the trade or the source of the non-public information.

"Tipping" Prohibited

Except when necessary in the course of performing job duties, all associates are prohibited from disclosing to anyone, including family members, any material, non-public information about any company. Also, all covered associates are prohibited from making buy or sell recommendations to anyone based on such "inside information."

"Stop Loss" Orders Prohibited

Associates are prohibited from placing "stop loss" or "limit" orders involving company stock.

However, exceptions regarding limit orders may be made, with prior approval from The Timken Company Legal Department, in cases where limit orders:

- 1. Do not exceed two weeks:
- 2. Do not extend past the open window period; and
- Are made by covered associates not in possession of material, non-public information. If material, nonpublic information is acquired at any time during the two week period, the limit order must be cancelled.

Speculative Trading Prohibited

Associates are prohibited from engaging in any speculative transactions involving company stock or securities including:

- 1. Buying or selling puts or calls;
- 2. Short sales; or
- 3. Purchase of company stock on margin.

<u>Transactions Totaling More Than \$25,000 in Six (6)</u> <u>Months Require Prior Approval</u>

Any associate not in possession of material, non-public information who wishes to engage in a transaction involving more than \$25,000 of company stock within a six-month period must adhere to the process below. If you are liquidating shares of The Timken Company from the ESOP stock fund in your 401(k) account and you are not an insider, then this requirement does not apply for such transaction(s). Please remember, however, that you should always be mindful of insider trading laws, and never conduct Timken Company stock-related transactions when in possession of insider and/or non-public information.

Step 1

Confirm via email to Hansal Patel, Corporate Secretary of the company, that you are not in possession of insider and/or non-public information.

The Corporate Secretary will, in turn, provide you with authorization to conduct stock-related transactions for up to a two-week period. After two weeks, another approval is required. **Transactions must not be initiated until your authorization is confirmed.**

Step

2

Submit the appropriate Trade Acknowledgement Form - Stock or 401(k) - prior to initiating the trade.*

*Sample Trade Acknowledgement Forms for Trading In Company Securities

FORM FOR 401(k)-RELATED TRANSACTIONS

TIMKEN

401(k) TRANSACTIONS TRADE ACKNOWLEDGMENT FORM FOR TRADING IN SECURITIES OF THE TIMKEN COMPANY (TKR)		
I,, desire to consummate a trade in shares of The Timken Co		
that I am not in possession of any material, non-public information concerning The Timken Company	or any of its affiliates.	
Complete Steps 1-3 below. *		
Check the appropriate box.		
401(k) TRANSACTIONS ¹ (Check all that apply.)	Number of Stock Fund Units, Percent or Amount if applicable	
☐ Buy Timken Company (TKR) Shares in 401(k) — applicable only to eligible plans		
☐ Sell Timken Company (TKR) Shares in 401(k)		
☐ Take out a 401(k) loan		
☐ Pay off a 401(k) loan		
☐ 401(k) rebalance		
☐ Receive dividends on stock held in ESOP		
☐ Reinvest dividends on stock held in ESOP		
Obtain approval from the Timken Legal department . (Send email to Hansal Patel - hansal.patel@timken.com – or Christine Przybysz - christine.przybysz@timken.com - confirming that you are not in possession of any material, non-public information concerning The Timken Company or any of its affiliates.)		
3. Return this completed form to the Timken Benefits department. (benefits@timken.com or 4500 Mount Pleasant Street NW, WHQ-04, North Canton, OH 44720)		
Signature Date		

*Non-insiders: You must follow Steps 1-3 above if your transactions will total \$25,000 or more within a six-month period. This does not apply to purchases made pursuant to your existing allocation. Please remember, however, that you should always be mindful of insider trading laws, and never conduct TKR stock-related transactions when in possession of insider and/or non-public information.

3/1/19

Notes:

- 1. **Stock Transfers Greater than \$25,000** Complete this portion of the Trade Acknowledgement Form if you are an insider and are conducting transfers involving the ESOP stock fund when such transfers are in excess of \$25,000 within a sixmonth period.
- 2. **401(k) Transactions** Complete this portion of the Trade Acknowledgement Form if you are an Insider and wish to conduct a transaction within your 401(k) plan.

FORM FOR STOCK-RELATED TRANSACTIONS: NON-401(k)

TIMKEN

INSIDER STOCK TRANSACTIONS TRADE ACKNOWLEDGMENT FORM

FOR TRADING IN SECURITIES OF THE TIMKEN COMPANY (TKR)

, desire to consummate a trade in shares of The Timken Company ("Timken"). I hereby

C	omplete Steps 1-3 below.*		
1.	Check the appropriate box.		
s	TOCK OPTION EXERCISES (Check and complete all that apply.)	Number of Shares	
S	tock Swap ¹		
Г	Surrender of shares of stock for option cost		
	Surrender of shares of stock for taxes		
C	Option Exercise ²		
Е	Cash Exercise		
Г	Cashless for Cash		
С	Cashless Hold		
N	MISCELLANEOUS (Not within 401(k) plan)	Number of Shares	
Е	Open Market Sale		
Е	Open Market Purchase		
Е] Gift		
С	1 Other		
1	Stock Swap - A form of a cashless exercise transaction in which shares of Company stock (to verify the number of shares held) in lieu of cash to pay for the stock option exercise.	already owned are delivered by attestation	
2	Option Exercise - There are two types of cashless exercises. If you elect a "Cashless for C after paying the exercise price, taxes, and any fees, the participant receives the remaining exercise, the broker will sell just enough shares to cover the exercise cost, taxes, and fee:	g <u>proceeds</u> . If you elect a "Cashless Hold"	
T w n	though The Timken Company Insider Trading Policy prohibits Company Insiders ("Cower when securities, exceptions to the Policy may be made, with prior approal from The Tim there limit orders 1) do not exceed two weeks 2) do not extend past the open window per to in possession of material, non-public information. If material, non-public information eriod, the limit order must be cancelled.	ken Company Legal Department, in cases iod and 3) are made by Covered Associates	
2.	Obtain approval from the Timken Legal department for Stock Option Ex (Send email to Hansal Patel - hansal.patel@timken.com – or Christine Przybysz – christi you are not in possession of any material, non-public information concerning The Timker	ne.przybysz@timken.com - confirming that	
3.	. Return this completed form to Timken Compensation & Benefits. (Danieta Cargnel - danieta.cargnel@timken.com, 4500 Mount Pleasant Street NW, WHQ-04, North Canton, OH 44720)		
	Signature Date		

Non-insiders: You must follow Steps 1-3 above if your transactions will total \$25,000 or more within a six-month period. Please remember, however, that you should always be mindful of insider trading laws, and never conduct TKR stock-related transactions when in possession of insider and/or non-public information.

3/1/19

Permitted Transactions

Except as stated above, associates who are not in possession of material, non-public information may trade in company stock whenever they choose. However, the preferred and safest time is during designated window periods.

Preferred Window Periods for Trading Company Stock

Window periods typically occur every quarter, commencing on the third business day following the release of financial results and concluding at the end of that month. Window periods are not quaranteed.

To determine exact dates, contact Hansal Patel, Corporate Secretary. Trading during these window periods will help to avoid any appearance of impropriety.

401(k) Plan Purchases

Transfers out of the company stock fund portion of the covered associate's account under the plan, the taking out of loans from the plan and the repayment of loans from the plan should never be entered into when the covered associate is in possession of material, non-public information. Purchases or transfers into the company stock fund are no longer permitted. Should any questions arise about this policy or its application to a particular transaction, you should contact Hansal Patel, Corporate Secretary.

Individual Liability

Individuals who violate this policy may be violating the law. Penalties provided by law include criminal liability (prison term up to 20 years and criminal fine up to \$5,000,000 per violation for individuals) and civil penalty (up to three times the profit gained or loss avoided).

WORKPLACE DATING/ROMANCE

Timken does not prohibit workplace romances between associates. The company does desire to avoid misunderstandings, actual or potential conflicts of interest, complaints of favoritism, possible claims of sexual harassment, and the associate morale and dissension problems that can potentially result from romantic relationships involving associates in the workplace.

When, in the opinion of the company, personal relationships create a conflict of interest, cause disruption, create a negative or unprofessional work environment, or present concerns regarding supervision, safety, security or morale, the company will take appropriate action to address the situation.

Associates involved in a workplace romance should promptly disclose the relevant circumstances to their supervisor or human resources representative so that a determination can be made as to what appropriate actions, if any, should be taken. The supervisor or human resources representative will contact Associate Relations for a final determination. The determination will be made based on the circumstances and can include actions resulting in job transfers or termination of employment.

Failure to disclose a workplace romance pursuant to this policy may lead to disciplinary action, up to and including termination.

JOB FACTS AND GENERAL INFORMATION

JOB FACTS AND GENERAL INFORMATION

This section is intended to give you the information you need to be familiar with your role as an associate. Many of the following policies are general in nature. For additional information on specific policies or practices as they relate to you and your facility, contact your manager/supervisor or human resources representative.

ABSENCE

Absence affects all of us. When one associate fails to meet his/her schedule, the work of other associates and the company may suffer. That is why it is important for each of us to take our work schedules seriously.

We all understand that occasional absence for illness or injury will occur, and we want associates to take the time they need to get better. However, habitual absenteeism—authorized or unauthorized—is not acceptable, and corrective action may be taken. The same is true for habitual tardiness or early leaves. In general, please remember:

- It is important for you to report for work on time and be ready to start when your scheduled work period begins. Others are counting on you.
- If you are absent from work without authorization for five days or the number of days specified at your facility, or if the company determines your absence is unauthorized, you are considered as having voluntarily quit the employ of the company.
- You are expected to remain at work for the entire length of your workday, unless you have otherwise secured an approved leave to depart early. Should you decide to leave your workday prior to its conclusion without appropriate approval, your early departure will be deemed an absence as well. If you must leave work for any reason before the end of the workday, you must notify your immediate manager/supervisor so that proper coverage, if necessary, may be secured.

For additional information on this policy as it relates to your facility, contact your manager/supervisor or human resources representative.

Reporting Unavailability for Work

If you must call off, contact your manager/supervisor as soon as you know and prior to your start time.

Return-To-Work Examination

The purpose of this examination is to ensure that the associate is able to perform the essential functions of his/her occupation upon return to work.

Associates Returning to Work Following an Injury or Illness

Prior to return, associates will need to contact a human resource or medical services representative at his/her location to determine whether a medical examination is warranted, when they:

- 1. Were absent five (5) or more consecutively scheduled workdays due to illness.
- 2. Were absent one (1) or more consecutively scheduled workdays because of an injury.
- Contracted any contagious/communicable disease that a health care professional has advised you to report to your employer.
- Were admitted to hospital (not outpatient or emergency room care) because of an illness or injury at any time.
- Had any surgical procedure, even if no work days were missed, the associate was not scheduled to work, or took vacation time, if there could be an adverse effect on workplace safety or if an accommodation is required.
- Were injured while participating in a companysponsored recreational program.
- Have received new medical restrictions or requirements that could have an adverse effect on workplace safety or that require an accommodation.

At the time of the examination the associate should provide a written statement from their treating physician stating:

- Approval for return to work including the effective date.
- 2. Work restrictions, if any.

ACCIDENTS

If you are **involved in an accident** while in the office, plant or in the course and scope of your employment, report to your supervisor/manager or a medical services representative at your location immediately, unless unable. **An accident report should be completed as soon as possible.** If you need medical treatment and company medical services are not available, you must report the injury/accident to your supervisor/manager or security services, and arrangements will be made for transportation to a medical facility.

BADGES/SECURITY IDENTIFICATION

A security ID badge was provided to you when you were hired. As a protective measure for you and the company, you may be required to show this security badge upon entering a company facility or at any time while on company premises. You are required to prominently display your security badge while on company premises. The Timken Company personnel including security services, payroll and a supervisor/manager also may ask you to show this identification. Non-exempt associates may enter a company facility no more than 30 minutes before the start of their scheduled shift and should exit no later than 30 minutes after the end of their scheduled shift.

If you forget, lose or misplace your identification, contact security or human resources immediately for temporary identification. If your security badge is permanently lost, you may obtain a new badge from security services or human resources. A fee may be charged for replacement.

BULLETIN BOARDS

A main source of information about your company is your manager/supervisor. You should, however, make it a practice to look at the bulletin boards. Information about work schedules, company activities, information required by law and other official postings are placed on these boards. Notices of general interest are posted there. Items placed on any general plant/office bulletin board must be approved by the appropriate management representative or the human resources representative. Departmental bulletin boards must be properly maintained, and all postings must be approved by the manager of the department.

CELLULAR (CELL) PHONES - PERSONAL PHONES

The following information about cell phone usage provides general guidelines for the company. You should also consult your local human resources representative for any additional applicable local policies.

Use of cell phones during working time and in working areas is prohibited unless authorized by your manager/supervisor. As with other personal property, associates bring their cell phones to work at their own risk. The Timken Company will not be responsible for any damage to, or loss or theft of, any personal cell phone brought onto company premises.

Cell phones may not be used for picture taking, audio recording or video taking of any Sensitive Company Information as defined in this handbook, including, but not limited to, equipment, documents, processes or any other confidential or proprietary company property without authorization from your manager/supervisor for business reasons.

Nothing in this policy shall be construed to limit, in any way, your rights under applicable federal, state or local laws, including, but not limited to the National Labor Relations Act and your right to organize or engage in protected concerted activity, including the discussion or sharing of information related to wages, hours, or other terms and conditions of employment. Such rights include, but are not limited to, actions for the purpose of documenting potentially unsafe equipment or working conditions.

The image-capturing (picture or video) or audio recording capabilities in cell phones should not be used in areas such as locker rooms or restrooms. If an associate must take a cellular phone into a locker room or restroom area that cellular phone should be limited to use which does not infringe upon the reasonable expectation of privacy other associates have when using the area.

Use of Cellular Phone Capability While Driving

The company is concerned about the safety of its associates and the dangers of distracted driving. The Timken Company prohibits:

- Hand-held cell phone usage while operating a company vehicle;
- Hand-held usage of a company-issued cell phone while operating a personal vehicle;

- Hand-held cell phone usage while driving on company business, regardless of whether the cell phone and/or vehicle are owned by the associate; or
- Hand-held cell phone usage to conduct company business while driving, regardless of whether the cell phone and/or vehicle are owned by the associate.

This includes, but is not limited to, answering or making phone calls, engaging in phone conversations, listening to voice mail messages, and reading or responding to e-mails or text messages.

Although this policy does not prohibit cell phone usage with "hands-free" equipment or similar equipment, except where such "hands-free" use is prohibited by law, associates should be very aware that there are still risks associated with such use.

Associates are encouraged to:

- Turn cell phones off or put on silent or vibrate before starting the car;
- Pull over to a safe place if a call must be made or received or to check e-mail, voicemail or text message while on the road;
- Consider modifying voicemail greeting to indicate that you are unavailable to answer calls or return messages while driving;
- Inform clients, associates and business partners of this policy as an explanation of why calls may not be returned immediately.

Any illegal use of a motor vehicle while performing company business, including the use of a cell phone while driving where such use is illegal, is strictly prohibited. Associates who are charged with traffic violations for any reason while engaged in company business will be solely responsible for all liabilities resulting from such actions. Violations of this policy may be subject to discipline up to and including termination.

COMMUNITY VOLUNTEER ENGAGEMENT

Timken encourages associates to help make the world a better place by being an active volunteer in communities where they live. Volunteering not only provides the chance to shape the world around you, it can also offer professional development opportunities as outlined in our leadership

pipeline guidelines. Evaluation of such opportunities should be discussed with your manager.

If your volunteer involvement conflicts with your normal work hours, you must have approval from your manager to be away from work. This applies to your personal volunteer commitments as well as company-supported or companyled events or initiatives like Junior Achievement, United Way or Habitat for Humanity. If these teams meet during your normal work hours, prior manager approval is required. It is in your manager's discretion to determine if this time away will be permissible.

For information regarding community opportunities or if you are interested in posting community information, please contact your local community relations coordinator or human resources representative. For information about The Timken Company sponsorship, please contact your manager or the Communications Department in North Canton, Ohio.

CONTINUOUS IMPROVEMENT - ASSOCIATE INVOLVEMENT

Your involvement in continuous improvement is vital to the success of the company. You should be finding and implementing better ways to serve our customers more efficiently. At all times, your managers are ready to hear ideas you may have for doing your job better. Associates' suggestions have provided ways to improve the quality of our products, increase the productivity of our equipment, reduce costs, improve communications, manage associate relations issues, and maintain a good safety program—all of which makes jobs more secure. When each of us does our job accurately, in a timely manner and using only those resources absolutely necessary, the company can satisfy the requirements of its current customers and gain new customers.

DRESS CODE POLICY

Note: The following information provides general guidelines for the company. You should also consult your local human resources manager for any additional applicable local policies. Clothing should be appropriate and support the general image of the company. Each associate is relied upon to use his or her own good judgment in choice of clothing.

In cases where clothing or appearance does not fully meet the expectation for appropriate attire, it is the responsibility of the management of each department or area to review this with the associate(s) involved and see that corrective action is taken.

Manufacturing Environment

In the manufacturing environment, certain standards of dress are required to ensure safe, efficient operations. Associates working near machinery are not permitted to wear loose or ragged clothing, loose skirts or dresses, rings, necklaces, beads, wrist watches or bracelets. Shoes must be closed-toed, closed-heeled, and cannot be made totally of canvas material. Shirts must be worn in the plants at all times.

Office Environment

If you are an associate who works in an office environment you have the ability to "dress for your day". How you dress depends on your work activities, as well as the people you or your department will interact with on any given day. Our policy enables you to show your individuality while exercising good-judgment, knowing that how you represent yourself reflects on you – and the company.

Appropriate Examples:

In general, clothing items that are clean, neat and convey a sense of professionalism and effectiveness in your job are appropriate for the workplace. Jewelry, makeup, perfume, cologne, tattoos, and piercings when worn or displayed need to be in good taste. All associates should be cognizant of potential allergies and sensitivities to certain aromas and chemicals in perfumes and colognes and use these substances with restraint.

- · Clothes that are ironed, clean, and neat
- Formal skirts (knee length or longer)
- Formal pants, khakis, well-fitting jeans (i.e., not too tight or baggy) of a dark and uniform color (i.e., unfaded)
- Timken-branded polo shirt with collar
- Non-athletic shoes

Inappropriate Examples:

Clothing that works well for the beach, yard work, dance clubs, exercise sessions, and sporting events is generally not appropriate for the workplace. Clothing that reveals too much (e.g., your back, your chest, your stomach, your undergarments, etc.) is not appropriate.

- Dirty or ripped clothing
- Ripped, baggy, or frayed jeans
- Short skirts (skirts more than one inch above the knee)
- Shorts, cargo pants
- Spandex, jogging suits, sweat suits, workout clothing, beachwear
- Tank tops, low-cut or backless blouses and any clothing item exposing the midriff area
- Any t-shirts without a collar
- Shirts with offensive or politically-charged logos or slogans
- Flip flops, sneakers, or sport sandals
- Hats or head coverings (special circumstances should be discussed with management)

On any given day, you will see suits, business casual and jeans because the answer of how to dress will be different for every employee, every day of the week. Remember, all casual clothing is not suitable for work. Here are some general guidelines that may help:

- If you have a meeting with customers who normally wear business attire, you should wear a suit or dress.
- If you have a meeting with customers who normally wear casual attire, you should consider wearing dressier jeans and a blazer.
- If you are representing the company at a local networking event in the business community, you should consider wearing a suit or dress.
- If your day's more low-key or only involves other Timken employees, jeans and a nice polo shirt or sweater are appropriate.
- If you are representing the company while volunteering in the community, consider wearing more casual attire, a Timken t-shirt perhaps and jeans that do not have holes.
- If you just like dressing up for work, you can dress up whenever you choose.

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The information contained in this section is provided for guidance only and meant to help you when deciding what is generally acceptable and unacceptable attire choices. No dress code can cover all situations so you must exert a certain amount of judgment in your choices of work clothing. If you are feeling uncertain or have questions, please ask your manager or your human resources representative.

If clothing or other attire fails to meet these standards, as determined by the associate's manager or a member of human resources, proper action will be taken, which may include discussions with the associate or requiring the associate to change clothes, or other measures. Recurring offenses may lead to disciplinary action, up to, and including, termination.

EDUCATIONAL REIMBURSEMENT PROGRAM - POLICY

A fundamental objective of the company is to achieve and sustain profitable growth and operational excellence. Developing our associates' skills is critical to our success, and we recognize that a university-based degree program may be an integral component of an associate's development plan. The company is committed to supporting cost-effective continued education that is aligned with the company's core business objectives.

The Educational Reimbursement Program (ERP) is intended to reimburse tuition and covered expenses for degreed programs that meet the other requirements discussed in this policy. University courses for business-related training not intended to lead to a degree are not within the scope of the ERP and are to be addressed by manager/supervisor approval in the same manner as other types of approved training.

The ERP is offered according and subject to the rules and conditions provided in this policy. Participation is at the discretion of the company as exercised by its management. The company intends to continue the ERP, but it reserves the right to amend, suspend or terminate the ERP at any time, in whole or in part. An associate's participation in the ERP does not constitute a contract of employment, give rise to any expectation of continued employment, promotion or increase in compensation, or diminish the right of either the associate or the company under applicable law to terminate the employment relationship at any time, with or without cause.

For eligibility requirements and detailed policy information, please view Timken home page and search for Educational Reimbursement Program

EMPLOYMENT POLICY

The company's human resources philosophy emphasizes placing qualified candidates in positions in our plants and offices. During our selection process, we refer to the following policies concerning equal employment opportunity, the hiring of relatives, the rehire of former associates, and serious illness. These guidelines are followed with the ultimate goal being to place qualified candidates in each open position.

At-Will Employment Policy

Each associate's employment with Timken is voluntary and associates are free to resign at any time with or without notice. Likewise, Timken is free to end any employment relationship at any time, with or without cause, and with or without notice.

Accordingly, the company makes no promise that your employment will continue for a set period of time or that your employment will be terminated only under particular circumstances. The relationship between the company and its associates is one of voluntary employment "at-will."

Only the General Counsel of the company possesses the authority to enter into any agreements contrary to this At-Will Employment Policy. If the General Counsel chooses to enter into an agreement altering the at-will nature of your employment, a written agreement, signed by both the associate, or the associate's representative, and the General Counsel will be executed to document the relationship. No associate may rely upon any oral comments made by any company representative, including the General Counsel, or any written agreements that fall short of containing the signed agreement of the General Counsel to justify any claim that the at-will relationship has been altered.

Any statements contained in this handbook or any other handbooks, manuals, employment applications or any other materials provided to applicants and associates do not and cannot modify this policy. None of these documents, whether standing alone or combined, are to create an express or implied contract of employment for a definite period, nor any express or implied contract concerning any terms or

conditions of employment. Similarly, company policies and practices are not to be considered as creating any contractual obligation on the company's part or instituting a requirement that termination will only occur for "just cause." Any statements relating to specific grounds for discipline or termination set forth in this handbook or any other documents are examples only, not all-inclusive lists and are not intended to restrict the company's rights to terminate associates under this policy section of the handbook.

Career Opportunities

Timken encourages associates to be involved in the management of their own career path. Associates should keep their talent profiles in MySuccess updated in order to facilitate career discussions and opportunities. In addition, associates can search for, apply to, and manage internal career opportunities by using the careers page in MySuccess. For more information regarding career development or open positions, please contact your human resources representative.

Equal Employment Opportunity Policy

The Timken Company is committed to providing a work environment free from all types of unlawful discrimination and harassment, including sexual harassment and harassment based on an individual's race, religion, color, national origin, ancestry, age, disability, genetic information, gender or gender identity, sexual orientation, protected veteran status or any other basis protected by applicable law. Accordingly, the company will not tolerate unlawful discrimination, sexual harassment or any other types of unlawful harassment. It is also the company's policy to prohibit any and all forms of retaliation against any individual who has complained of harassing or discriminatory conduct or participated in a company or agency investigation into such complaints.

The Company abides by all local, state and federal laws regarding equal employment opportunity. Every person who applies for a job or who works for the company will be considered solely on their qualifications and performance in connection with all employment decisions, including but not limited to recruitment, hiring, placement, compensation, benefits, promotions, termination and all other aspects of employment. All employment decisions will be made without regard to an individual's race, religion, color, national origin, ancestry, age, disability, genetic information, gender or

gender identity, sexual orientation, protected veteran status or any other basis protected by applicable law.

The company does not, and will not, tolerate any discrimination or harassment, and any associate violating this Equal Employment Opportunity Policy or the Policy Against Harassment, set forth elsewhere in the associate handbook, is subject to disciplinary action, up to and including termination.

Accommodating Qualified Individuals with Disabilities

The company does not discriminate against applicants or associates with disabilities, against applicants or associates who are associated with a disabled person (e.g. an applicant's child, parent, ward, etc.) or against applicants or associates, regardless of sex, who are caregivers of a disabled person.

In furtherance of the company's conviction that all qualified individuals are entitled to the opportunity for equal employment opportunity, any associate who believes he or she needs an accommodation because of a physical or mental disability should request such accommodation(s), if able to in writing, from the human resources department.

In connection with your request, representatives of the human resources department will meet with you to discuss your functional limitations and how to address such limitations to allow you to perform your job duties. As part of this process, human resources representatives may ask you to provide documentation as to the underlying condition and specific limitations from your health care provider. The ultimate goal of this meeting and process is to allow human resources to provide you with a reasonable accommodation of your disability (i.e. adjustments or assistance to allow you to perform your essential functions at an acceptable performance level, if warranted under the circumstances).

If you have further questions about this policy or if you believe you have experienced disability discrimination, contact the human resources manager as soon as possible, call the Timken HelpLine, use the Open Door Policy, or follow the steps outlined under Reporting Misconduct (all of these procedures are set forth in the handbook). To the extent possible, all such inquiries will be treated confidentially.

Hiring Relatives Policy

While it is the policy of The Timken Company to encourage capable relatives of associates to seek employment with the company, it is also the intent of the company not to create a conflict or apparent conflict of interest. No immediate relative of an associate will be hired when it results or is reasonably likely to result, in the associate directly or indirectly being responsible for the supervision, evaluation, salary recommendations or promotional opportunity of a relative. To ensure that the company will have an effective workforce, the consideration of whether a relative of a current associate can be hired will be based upon the following considerations:

- 1. The associate's job level.
- 2. The relationship of the applicant to the associate.
- 3. The location of the job vacancy to be filled.

Immediate relatives as a general rule will not be hired in the same department or under the same functional Director; however, each situation will be evaluated on a case by case basis. For the purpose of this policy, immediate family includes an associate's spouse, father, mother, sons, daughters, brothers, and sisters.

An independent review will be made on a case by case basis for associates currently employed by The Timken Company who become related by way of marriage or otherwise during the course of the employment. The company will have the final decision on the resolution.

Rehire Policy

Former associates who voluntarily left their employment at the company may be considered eligible for re-employment. Typical examples of situations where an associate separated from the company and may be considered for rehire include:

- Pursuit of additional education;
- · Relocation with spouse;
- Domestic responsibility (i.e. the full-time care of children, elderly parents or a sickness or injury at home that requires full-time attention); and
- Employed part-time and quit due to the expiration of a temporary assignment or because they were able to secure full-time employment opportunities not otherwise offered by the company.

If former associates wish to be considered for rehire, they must follow the same procedures as any other applicant. They will be considered for re-employment along with other applicants as job vacancies occur. Rehires must be approved by Associate Relations.

FAMILY & MEDICAL LEAVE ACT (FMLA)

The company is committed to complying with the federal Family and Medical Leave Act and any other applicable state law related to similar leaves. For further information, please refer to the Total Rewards Handbook or contact your Human Resources representative or The Timken Company FMLA administrator.

Eligibility Requirements

Associates are eligible for FMLA leave if they have been employed by the Company for at least one year, for 1,250 hours over the previous 12 months,* and at a worksite with at least 50 associates within 75 miles of that worksite.

* Special hours of service eligibility requirements apply to airline flight crew employees.

Basic Leave Entitlement

If you are eligible for FMLA, you may take up to 12 weeks of unpaid, job-protected leave during a rolling "12-month period" (defined below) for the following reasons:

- For incapacity due to pregnancy, prenatal medical care or child birth;
- To care for the associate's child after birth, or placement for adoption or foster care;
- To care for the associate's spouse, son or daughter, or parent, who has a serious health condition; or
- For a serious health condition that makes the associate unable to perform the associate's job.

Notes:

- A "child" means a biological, adopted or foster child, a stepchild, a legal ward or a child of a person standing in loco parentis, who is either under the age of 18, or 18 and older and "incapable of self-care because of a mental or physical disability."
- A spouse includes a same-sex spouse who meets the definition of spouse.

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- A "serious health condition" is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility or continuing treatment by a health care provider for a condition that either prevents the associate from performing the functions of the associate's job or prevents the qualified family member from participating in school or other daily activities. Subject to certain conditions, the "continuing treatment" requirement may be met by a period of incapacity of more than three consecutive calendar days combined with at least two in-person visits to a health care provider or one in-person visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition.
- The determination of when or how additional treatments or visits, or a regimen of continuing treatment is necessary within the 30-day period will be made by the health care provider. Other conditions may meet the definition of continuing treatment.
- FMLA leave taken for childbirth or placement for adoption or foster care expires at the end of the 12-month period beginning on the date of the birth or placement.

A husband and wife both employed by the company and eligible for FMLA leave are permitted to take no more than a combined total of 12 weeks in a 12-month period for childbirth, adoption/foster child placement, to care for the child after birth or placement, or to care for a parent with a serious health condition. However, this does not preclude either associate from using the remainder of the 12 weeks for other FMLA-qualifying events.

Military Family Leave Entitlements

Eligible associates with a spouse, son, daughter, or parent on covered active duty or call to active duty status in the National Guard, regular Armed forces, or Reserves may use their 12- week basic leave entitlement to address certain qualifying exigencies ("qualifying exigency" leave). Qualifying exigencies may include certain military events, arranging for alternative child or parental care, addressing certain financial and legal arrangements, attending certain counseling sessions and attending certain reintegration briefings.

FMLA also includes a special leave entitlement that permits eligible associates to take up to 26 weeks of unpaid, jobprotected leave to care for a covered service member during "a single 12-month period" as defined below ("military caregiver" leave). A covered service member is 1) a current member of the Armed Forces (including the National Guard or Reserves) who is undergoing medical treatment, recuperation or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability list for a serious injury or illness;* or 2) a veteran of the Armed Forces (including the National Guard or Reserves) who was terminated or released under conditions other than dishonorable at any time during the 5- year period prior to the first date the eligible associate takes FMLA leave to care for the covered veteran, and who is undergoing medical treatment, recuperation, or therapy for a serious injury or illness.* An associate taking military caregiver leave is limited to a combined total FMLA leave entitlement of 26 work weeks, with the associate being able to use up to 12 of those 26 work weeks for birth or adoption/ foster child placement, to care for a child after birth or placement, to care for a spouse, son, daughter, or parent with a serious health condition, because of the associate's own serious health condition, or for qualifying exigency leave.

* The FMLA definitions of "serious injury or illness" for current service members and veterans are distinct from the FMLA definition of "serious health condition." If you have questions concerning this definition contact the FMLA Administrator.

For purposes of military caregiver leave, a husband and wife both employed by the company and eligible for FMLA leave are permitted to take no more than a combined total of 26 weeks in a 12-month period for childbirth, adoption/foster child placement, to care for the child after birth or placement, to care for a parent with a serious health condition, or for military caregiver leave.

Leave Calculation: "12-Month Period"

Your FMLA leave allotment for "basic leave," including qualifying exigency leave, is calculated on a rollback-year basis and assessed with each new leave request. Any time off on FMLA during the 12 months prior to the start date of a new leave will be deducted from your leave allotment. Except in the case of military caregiver leave, your FMLA leave allotment never exceeds 12 weeks in a 12-month period.

For purposes of military caregiver leave, the "single 12-month period" begins on the first day the associate takes FMLA leave to care for a covered service member and ends 12 months after that date. If the associate does not take all 26 work weeks of leave, the remaining part of his or her 26 work weeks of leave entitlement is forfeited.

Use of Leave

FMLA leave usually will be taken for a consecutive period. However, leave can be taken intermittently or on a reduced leave schedule when medically necessary due to a serious health condition of the associate, the serious health condition of the associate's spouse, son, daughter or parent, or the serious injury or illness of a covered service member. Associates must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the company's operations. Leave due to qualifying exigencies may also be taken on an intermittent basis.

An associate is not entitled to utilize his or her FMLA leave on an intermittent or reduced leave basis for the care of a child after birth, adoption or foster care placement.

In the case of childbirth, leave for female associates for incapacity due to childbirth will count toward the 12-week leave entitlement. Once the period of incapacity has expired, the female associate may take the remaining balance of the 12 weeks as unpaid leave to care for the child, provided her FMLA entitlement has not been exhausted during the 12-month period. Eligible spouses, who both work for The Timken Company, are limited to a combined 12 weeks of FMLA leave in the 12-month period for the birth of a son or daughter and bonding with the newborn child.

Substitution of Paid Leave for Unpaid Leave

Associates may choose or the company may require use of accrued paid leave while taking FMLA leave. In order to use paid leave for FMLA leave, associates must comply with the company's normal paid leave policies.

Vacation use is required for all intermittent and reduced schedule FMLA leave arrangements. In these cases, vacation and FMLA run concurrently.

Associate Responsibilities

Associates must provide 30 days advance notice of the need to take FMI A leave when the need is foreseeable. When 30

days' notice is not possible, the associate must provide notice as soon as practicable and generally must comply with the company's normal call-in procedures.

Associates must provide sufficient information for the company to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave. Sufficient information may include that the associate is unable to perform job functions, the existence of the required family relationship, the family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a health care provider, or circumstances supporting the need for military family leave.

Associates also must inform the company if the requested leave is for a reason for which FMLA leave was previously taken or certified. It will be the associate's responsibility to inform their supervisor/manager or human resources representative of any impending FMLA leave. Associates also are required to provide a certification and periodic recertification supporting the need for leave.

Employer Responsibilities

The company will inform associates requesting leave whether they are eligible under FMLA. This notice will specify any additional information required as well as the associate's rights and responsibilities. If the associate is not eligible, the notice will provide a reason for the ineligibility.

The company will inform associates if leave will be designated as FMLA-protected and the amount of leave counted against the associate's leave entitlement, if known. If the company determines that the leave is not FMLA-protected, the company will notify the associate. The designation of your leave request will be documented in writing and will be given to you.

Certification of Health Care Provider

Certification from a health care provider is required from all associates requesting FMLA leave for their own serious health condition, for the purpose of caring for a spouse, child or parent with a serious health condition, and for the care of an ill or injured covered service member. You can obtain a certification form from your supervisor/manager, your human resources representative, or by contacting the FMLA administrator.

You must have the applicable certification form completed by the health care provider within 15 calendar days from the date you request leave. If extenuating circumstances delay the return of the form, you must communicate that information prior to the end of the 15-day time period. Barring extenuating circumstances, failure to provide a completed certification within 15 days may result in delay or denial of your leave request.

The company is not obligated to pay for the initial certification or subsequent recertification. This includes any paperwork fees the health care provider may charge. The company may request a second opinion at its own expense if there is a question about the validity of the certification, or a third opinion if the first and second opinions differ.

Appropriate documentation will be required for all military qualifying exigency leave requests.

Benefits and Protections

Your status, rate of pay and benefits will be maintained during your unpaid FMLA leave to the extent required by law. You will continue to receive group health benefits during the term of the leave as long as you continue to pay your portion of access fees, if applicable, according to the payroll deduction schedule and related practices. Please refer to your applicable plan document or contact the benefits team at benefits@timken.com for an explanation of further opportunities that you may have to continue your benefits.

By law, the use of FMLA leave cannot result in the loss of any employment benefit that accrued prior to the start of your leave. Upon return from FMLA leave, most associates must be restored to their original or an equivalent position with equivalent pay, benefits and other employment terms as more fully set forth under the heading "return to work" below.

Return to Work

During your leave, you may be required under appropriate circumstances to report periodically about your leave status and intent to return to work.

If you are on leave due to your own serious health condition, you must obtain and present a fitness for duty certification from the health care provider that you are capable of performing the essential functions of your job. You must have

your health care provider complete a return to work form (available through the disability plan administrator) or other documentation satisfactory to the company.

Upon return from FMLA job-protected leave, you will be restored to your original position or an equivalent one with equivalent pay, benefits and other conditions of employment to the extent required by law. However, you are not entitled to a greater right to reinstatement than if you had been continuously employed during leave. For example, FMLA leave cannot guarantee job restoration in the event of workforce reduction or shift elimination. Further, the company reserves the right to fill your position temporarily during the term and duration of your leave.

The company reserves the right to deny restoration to any "key" associate if it determines that substantial and grievous injury will result if the key associate is reinstated. A key associate is a salaried associate eligible for leave who is among the highest paid 10 percent of all associates within 75 miles of the worksite.

Associates who do not return to work as soon as they are able shall be considered to have resigned. Also, associates who fail to notify the company of an inability to return to work following the expiration of leave will be considered to have resigned.

Unlawful Acts by Employers

FMLA makes it unlawful for any employer to:

- Interfere with, restrain, or deny the exercise of any right provided under FMLA;
- Terminate or discriminate against any person for opposing any practice made unlawful by FMLA or for involvement in any proceeding under or relating to FMLA.

Enforcement

An associate has certain rights under the FMLA Regulations; they may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against the company.

Other Applicable Law

FMLA does not affect any federal or state law prohibiting discrimination, or supersede any state or local law or

collective bargaining agreement, which provides greater family or medical leave rights. Local state leave laws may have different eligibility requirements, criteria governing leave, and amounts of leave. If an associate's leave qualifies as leave under both the FMLA and local state law (such as the California Family Rights Act, for California associates), then the leave used will run concurrently under both laws and count against the associate's entitlement under both laws. For further information, please refer to jurisdiction-specific/local law addendums or contact The Timken Company FMLA administrator.

FIRE PROCEDURE

For your safety, you should be aware of and adhere to all evacuation procedures. Fire extinguishers are located throughout the facility. Please familiarize yourself with their locations. If fire occurs in your vicinity, report the fire immediately by dialing extension 3911, or the number designated at your facility. In some facilities, you may be required to dial an outside line first. Please familiarize yourself with the requirements in your facility. Do not attempt to extinguish the fire until you first report the emergency. If you use a fire extinguisher, report it immediately to your manager/supervisor so that the fire extinguisher may be recharged or replaced as needed.

FOOD SERVICE

The company has provided an eating facility where food and beverages may be purchased. If you bring your own food, you are invited to use the eating facilities. Eating periods depend on department work schedules.

GARNISHMENTS

Garnishments are attachments on your pay for an unpaid debt. We are required by law to withhold a portion of your wages due when a garnishment has been served on the company. Such garnished wages can only be released to you upon receipt by the company of an order from the court issuing the termination.

Unless otherwise prohibited by law, associates having garnishments by more than one judgment creditor in any twelve-month period will be subject to disciplinary action, up to and including termination.

HELPLINE

The company is proud of its long-standing reputation for integrity, ethics and respect for the law. For more than 100 years, your personal integrity has been critical in maintaining our company's impeccable reputation. Your voice is equally important. Anytime you have concerns regarding possible unethical behavior, share them with your supervisor, manager or a member of our human resources team or call the Timken

HelpLine, toll-free, day or night at 1-800-846-5363 or 1-888-732-1439. You may also report your concerns to the HelpLine via e-mail by logging onto www.timkenhelpline.com. Calls and e-mails may remain anonymous.

Some examples of situations that you should speak up about include:

- · Anti-trust compliance;
- · Conflicts of interest;
- Discrimination or harassment;
- Environmental or safety concerns;
- Health care fraud and abuse;
- Illegal drug or alcohol abuse;
- Improper export or import activity or other regulatory violations;
- Inappropriate gifts or gratuities;
- Industrial espionage;
- Insider trading;
- Questionable accounting or auditing practices;
- Theft or misuse of company or personal property; and
- Threats of violence.

The Timken HelpLine is a toll-free phone number that you can call if you are not comfortable discussing your concerns face-to-face. The HelpLine is available around the clock, every day. No call tracing or recording devices are ever used and, if you wish, you may remain completely anonymous. When you call the Timken HelpLine, a trained communication specialist, who is not employed directly by the company, will ask you a series of questions to better understand your concern. The specialist will prepare a report that is forwarded to the appropriate company representative for review and,

if necessary, investigation. At the end of your call, you will be given a unique identification number and a call-back date, after which you may follow-up on your report. Simply reference the identification number when you call. If additional information is needed from you, you will be asked for it when you call back.

The company will not tolerate any retaliatory act directed toward any individual who utilizes the HelpLine to raise a good faith concern or issue. If the company determines that an individual has engaged in retaliation, that misconduct will result in disciplinary action, up to and including immediate termination.

The HelpLine is not intended to be a substitute for meaningful communication between you and your supervisor or manager. If you have questions or concerns regarding normal operating procedures or suggestions for making your workplace more comfortable or efficient, please take them directly to him or her.

HOURS OF WORK

Your scheduled hours of work are assigned by your manager/ supervisor, and your work assignments depend on your team's work schedule. You are expected to be ready to work at the start of your shift and work until the end of your shift. When overtime is required, an associate is expected to cooperate.

HOUSEKEEPING

All associates are expected to keep the plant and offices clean to have a better, safer, more pleasant place to work. This includes workstations, parking lots, lockers and general areas of the offices and plant grounds.

INSPECTION

Timken is concerned about maintaining security, protecting company property and protecting associate property. The company reserves the right to search company premises and persons at any time without prior notice, including associates, visitors, suppliers or vendors, entering or leaving the premises.

Searches of the work premises may include, but are not limited to, an associate's desk, locker, files and cabinets, even if locked. Searches may also include the person's belongings, such as briefcase, lunch box, packages, containers, outer clothing, purses, backpacks and vehicles even if locked.

The company may deny entry to the premises to anyone refusing to submit to a search. Failure to cooperate in a search will result in disciplinary action up to and including termination.

INVENTIONS, DEVELOPMENTS AND DISCOVERIES

An associate's responsibilities may involve inventing, discovering, improving or developing new technology, products or ideas for the company. To the maximum extent allowed by law, all inventions, ideas, improvements and developments, which an associate shall make or have during the period of his or her employment with the company, and which relate to any facet of the company's business, are the property of the company. Associates agree to assign all such inventions, improvements, discoveries, developments and the like to the company and to sign all assignments, oaths, declarations, applications of Letters of Patent and any other papers or documents that may be reasonably required by the company with respect to any inventions, discoveries, improvements, developments and the like. In addition to this policy, associates may be bound to abide by supplemental policies or agreements related to associate inventions, discoveries and developments.

ITEMS NOT ALLOWED ON COMPANY PREMISES

For reasons of safety and security, you are not to bring, use or have in your possession firearms, weapons of any kind, explosives, alcohol, or any controlled substance (including marijuana) as defined in this handbook, on company premises at any time except where it is otherwise expressly permitted under federal and/or state law.

Possession of cameras, radios, recording devices and other electrical appliances on company premises is authorized only by special permission. Where such devices are connected with cell phones, laptops and the like, no unauthorized use of these items will be permitted. Cell phones and other recording devices may not be used for picture taking, audio recording or video taking of any confidential, proprietary or sensitive information as defined in this handbook, or in a manner that violates any right of an associate, at any time while during working times and in working areas without authorization from your manager/ supervisor.

Nothing in this policy shall be construed to limit, in any way, your rights under applicable federal, state or local laws, including, but not limited to the National Labor Relations Act

and your right to organize or engage in protected concerted activity, including the discussion or sharing of information related to wages, hours, or other terms and conditions of employment.

JOB TRAINING

You receive thorough training for the job that you are to do. In many cases, your training is on the job and comes from another designated and qualified associate. The instruction helps you develop the information and skill necessary to perform the work to which you are assigned. You are encouraged to request more instruction whenever you feel it can benefit your work.

JURY DUTY AND SERVING AS A SUBPOENAED WITNESS

You are excused from work for days you serve on a jury or as a subpoenaed/ disinterested witness in a court of law. You are paid your regular salary for each day served, if you were scheduled to work that day and were physically able to report to work.

To help in arranging work assignments, let your manager/ supervisor know as soon as possible about your jury duty or disinterested witness notice, when you are scheduled to serve, and approximately how long you expect to be gone, and provide a copy of your summons/subpoena.

You are to report for work on any regularly scheduled work day on which you are not scheduled to serve as a juror or witness. The court furnishes you with a written statement upon your discharge from the jury or your discharge as a witness. It shows the number of days you served as a juror or as a subpoenaed witness. This statement is to be given to your manager/supervisor.

LACTATION POLICY

The Timken Company shall provide lactating individuals a private location and time for expressing milk, to the extent required by applicable federal or state law. Reasonable time away from the job shall be permitted, which shall be unpaid unless otherwise required by wage and hour laws. A private, clean and secure room will be established for expressing at each facility upon request. The room should be designated as a lactation room. If a plant has a medical department, the medical facilities could be utilized. Restrooms should not be utilized unless there is a separate area away from the toilets and should only be used when other options are unavailable.

The storage and refrigeration of the milk is the responsibility of the individual, unless otherwise required by local law. The individual can bring a personal, insulated cooler and keep it with her personal belongings. Arrangements for time off the job must be approved by the individual's supervisor or manager.

LEAVING THE COMPANY

We hope that your employment with the company is mutually satisfactory. However, you are free to resign at any time for any reason, just as the company is free to terminate your employment at any time, with or without cause.

If you choose to leave the service of the company for any reason, you should advise your manager/supervisor at least two weeks before the last day you intend to work. If you are a member of the Executive Pay Group, you should advise your manager no less than four weeks prior to your last day. Your manager/supervisor would then arrange an exit interview for you with a human resources representative.

One of the purposes of this interview is to review with you the expiration dates of your benefits. You are required to sign an exit statement form. The signing of this form enables the company to complete its record of your employment. Your continuing obligations to the company with respect to any confidential information that you may have acquired during your employment are also reviewed at that time.

Upon your termination, you are responsible to account for and return: your security ID badge; company-issued credit cards; computer equipment; cell phone; and all materials, blueprints, specifications, memoranda, diaries, notebooks and other documents pertaining to the company's business you received or prepared in the course of your employment. Once these items have been returned, every effort is made to prepare your final pay as soon as possible, in a manner consistent with applicable law.

LOCKERS AND STORAGE SPACES

You may have a locker or storage space provided for your use. The company maintains the right to inspect your storage space and locker, even if locked. If valuables are kept in your storage space or locker, it is suggested that you keep them locked.

LOST AND FOUND

If you believe that you have lost articles on the company's premises, report the loss to your manager/supervisor. The company does all that is possible to assist in locating the lost article. However, the company does not assume responsibility for personal property. If you should find any articles belonging to someone else, give them to your manager/supervisor. Additionally, many of our facilities have lost and found areas within the security department.

MEDICAL PASSES

Associates who become ill while working at the company and need to go home or to see their doctor can do so upon proper notification of their manager/ supervisor. In locations where medical services are available, your manager/supervisor may require you to see a medical representative before leaving.

Associates who are injured on the job need to see Medical Services personnel before leaving work. For plant/facility locations that do not have an on-site clinic, associates who are injured on the job need to report the accident to their manager/supervisor or human resources representative before leaving. Associates should refer to the previous section of this handbook titled "Accidents" for procedures in the event of an accident.

MEDICAL SERVICES

The Company maintains, or contracts with, facilities to provide medical services that are supervised by licensed health care professionals. Any associate or job applicant may be required to undergo a medical examination when permitted by applicable law. These exams may be required by law, or necessary to determine a person's ability to perform the essential functions of the position in which they are currently employed, to which they are returning or being considered for.

Accurate and up-to-date medical information is essential during emergency situations. For this reason, it is important for you to report any change in your medical condition that could affect your safety or the safety of co-workers. This includes reporting to medical services any prescriptions you are taking that could affect workplace safety due to their potential side effects.

Following treatment or evaluation at a Timken Company medical clinic or contracted medical facility, you may be provided with a statement concerning your physical condition. Prior to your return to work this form must be immediately returned to your manager/supervisor.

Confidentiality

Your Timken Company clinic medical records will be kept confidential as required under The Family Medical Leave Act (FMLA), the Americans with Disabilities Act (ADA), the Genetic Information and Nondiscrimination Act (GINA), the Occupational Safety and Health Act (OSHA), state laws on patient privacy, and any other applicable laws. In most cases, Medical Services will obtain your consent prior to disclosing any of your medical information. However, there are some instances in which your medical information may be disclosed without your consent. For example, the company or a third party may need your medical information for treatment purposes, to determine whether you can do the essential functions of your job, or to determine whether you can work without posing a direct threat. Medical Services may also be required to disclose your medical information to the company or a third party in certain situations concerning a work-related illness or injury, a workplace-related medical surveillance, or as otherwise required by law. If permitted by law, we may also disclose an associate's medical information to the extent necessary to address situations involving falsification of information by the associate.

MILITARY SERVICE

Enlistment or Induction

If you engage in a period of service in the United States Armed Forces, you may qualify for re-employment, depending upon the length of your period of service in the uniformed services and other factors. As far in advance as is reasonable under the circumstances, you or an appropriate officer, as defined by federal law, should give notice of your intent to enter a period of service in the uniformed services to a human resources representative. If your length of service requires you to apply for re-employment, you should contact a human resources representative following your release within the time period specified by law.

National Guard or Military Reserve

The Timken Company is proud to employ members of the United States Armed Forces. Accordingly, the company has made the decision to provide a pay differential to compensate members of the uniformed services for certain types of military duty. You may be entitled to be paid an

amount equal to your daily regular wages minus your pay from the National Guard or the military reserve for each day you normally would have been scheduled to work. This is called military differential pay. In order for The Timken Company to correctly calculate your pay for the time missed from work for qualifying military duty, you must present to a human resources representative your official military pay statement showing the dates you were present for duty, the exact number of days you were present for duty, and your rate of base pay per day. Failure to timely submit military pay statements will result in a delay in processing your pay and failure to submit this information within three (3) months from your first day of your return to work after military duty may result in failure to receive military differential pay. Time compensated in this manner will not be used to calculate your regular rate of pay for overtime purposes.

Training Duty

If you are a member of the National Guard or Reserve and you are required to perform annual training, you are entitled to military differential pay up to a total of fifteen (15) days. If you are required to perform other types of military training (not including basic military training or other initial training), you may also qualify for military differential pay. Prior to performing such training duty, you should consult with your human resources representative to determine if you are eligible for military differential pay.

Active Duty

As a member of the uniformed services, you may also be ordered to active duty for extended periods of time. Timken associates ordered to active military service for certain deployments in direct support of combat operations may qualify for differential pay. Upon notification of your impending order to active duty, you should consult with your human resources representative to determine if you are eligible for military differential pay. Associates called to active duty for any reason will be re-employed in accordance with the requirements set forth under state and federal law.

Civil Emergencies

A Reservist or member of the National Guard ordered to active duty by a duly authorized civil authority in response to a civil emergency, such as a tornado, flood, storm, earthquake or other natural disaster, or to respond to a riot or some other civil disturbance, will be reimbursed by the company for the amount of differential pay up to a total of

fifteen (15) days. Orders must be issued by a competent civil authority: Governor of the State or President of the United States. When you return to work following a civil emergency, you should report to a human resources representative for instructions.

Whenever you are ordered to perform any type of military service, you must consult with your human resources representative and provide them with a copy of your orders or other document signed by an appropriate authority before leaving for military service. Please refer to the Uniformed Services Employment and Re-employment Rights Act (USERRA) for clarification of your rights and obligations when performing and returning from military service.

NOTARY PUBLIC

Occasions may arise when you require the services of a Notary Public. If your plant/facility provides this service, you may obtain it free of charge by contacting a human resources representative.

OPEN DOOR POLICY

There may be times when you have a problem, question or complaint. Management needs and wants to be aware of these issues. Our Open Door Policy is an affirmation of our belief that people are entitled to receive answers to their concerns from their immediate manager/supervisor, and they have the right to take questions further if they believe they have not received proper consideration.

The Open Door Policy consists of these general guidelines:

- 1. You may consult with your own manager/supervisor whenever you need help, information or advice. He or she works with you every day and should be in the best position to answer your questions fairly and promptly.
- 2. If you wish to discuss the matter further, you may want to take the subject up with progressively higher levels of management or, if you prefer, discuss the matter with a human resources representative.
- 3. Associates also have the option of calling the Timken HelpLine, toll-free, day or night at 1-800-846-5363. You may also report your concerns to the HelpLine via email by logging onto www.timkenhelpline. com. Calls and emails may remain anonymous. The

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HelpLine is not intended to be a substitute for meaningful communication between you and your manager/ supervisor. If you have questions or concerns regarding normal operating procedures or suggestions for making your workplace more comfortable or efficient, please take them directly to him or her.

OUTSIDE EMPLOYMENT

Any associate considering holding a second position is expected to advise his or her manager/supervisor or the human resources manager. The company may request an associate not take outside employment if the outside position conflicts with the associate's company position or prevents the associate from effectively meeting the performance standards for his or her position with the company.

The company expects that its work requirements, including any scheduled or unscheduled overtime, will take precedence over any outside work. If, as a result of any outside employment, an associate is unable to maintain an acceptable work performance standard that fully satisfies the company's expectations, the associate may be subject to discipline, up to and including termination.

PARKING POLICY

Parking spaces are provided near your work area. Parking policies may vary from facility to facility. Please consult your local human resources representative for clarification of your local policy.

You should park within the allotted spaces, obey all directional signs and speed limits, and extend proper courtesies to other drivers using the parking lot. Should you be involved in an accident while on company premises, your manager/supervisor and security services must be notified immediately.

At various facilities, a limited number of parking spaces are assigned with manager/supervisor approval on the following basis:

- Associates with a disability or who need accommodation due to a pregnancy-related condition. These requests are reviewed with medical services.
- 2. Associates who utilize their personal vehicles to travel daily on company business.
- 3. For security and safety reasons, associates required to work irregular hours on an off shift.
- 4. Associate job level.

PASSES TO REMOVE PROPERTY FROM COMPANY PREMISES

A Package Pass may be required if you wish to remove company property or some of your personal belongings from company premises. You should notify your manager/supervisor in advance to obtain the proper approval to remove these kinds of items from the premises.

PAY TRANSPARENCY

The company will not terminate or in any other manner discriminate against associates because they have inquired about, discussed or disclosed their own pay or the pay of another associate or applicant. However, associates who have access to the compensation information of other associates or applicants as a part of their essential job functions cannot disclose the pay of other associates or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is in:

- Response to a formal complaint or charge,
- Furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the company, or
- Consistent with the company's legal duty to furnish information.

PERSONAL DATA IN MYSUCCESS

We need up-to-date information about you and your family for our personnel records. Keeping this data current is vital to you as an associate and might affect your associate benefits, payroll deductions or how quickly your family may be contacted in an emergency.

MySuccess is the company's human resources information system. Access to MySuccess enables you to view and/or update the following personal data:

- · Candidate Profile
- County
- Education (to the extent it is job-related)
- Emergency Contact
- · Geographic Preference

- Home Address and home phone (If you do not have a phone, provide an alternative telephone number and indicate whose phone it is.) Being able to reach you quickly is sometimes necessary.
- Talent Profile (professional memberships, external work history, formal education etc., to the extent this information is job-related)
- Personal Information (marital status, veteran status, citizenship, to the extent this information impacts benefits or is job-related)
- Building code and drop number
- Certifications and licenses (to the extent this information is job-related)
- Language skills (to the extent this information is jobrelated)
- Community involvement (to the extent this information is job-related)

The following can only be viewed through MySuccess:

- Cost Center Detail
- · Pay Information
- Job History
- Status History
- Training

Please contact your human resources department if you have questions regarding use of MySuccess.

You should promptly notify your manager/supervisor, the human resources department at your facility or an associate benefits representative of changes in any of the following:

- Association or disassociation with any of the reserve components of the Armed Forces of the United States
- Your name
- Marital Status
- Number of dependents

Prompt notification is necessary to assure proper benefit coverage.

Note: For benefits purposes, certain changes in personal and/ or family status, such as marriage, divorce or the birth of a child, require that you notify the company within a specified time period. To find out more about these time limitations, contact your human resources representative, the benefits team at <u>benefits@timken.com</u>, or consult your applicable plan document.

PERSONAL MESSAGES, MAIL, PACKAGES

For emergency situations, you should make sure that members of your family know your associate identification number, department number and the proper telephone number where you can be reached. It is not practical to deliver personal messages to you while you are at work. Our mail service and lobbies are not equipped to handle personal mail or packages. We, therefore, ask you to mail these items at a local post office or mailbox. Please have personal mail and packages delivered to your home.

PERSONAL PROTECTIVE EQUIPMENT

If the company determines your occupation requires the use of personal protective equipment to properly protect you from sickness or injury, it is provided at no cost or a reduced cost to you in accordance with the prevailing practice at your plant and local law.

Your supervisor/manager arranges for you to obtain such personal protective equipment, and you are required to use it to ensure your safety.

POLITICAL OFFICE

Associates are encouraged to be involved in their communities. Some of our associates are elected or appointed to political offices in their communities. If work schedules permit, or as otherwise required by applicable law, the company will approve reasonable time off to perform official duties in an elective political office provided the time is arranged for and approved before the absence occurs.

PROBATIONARY PERIOD

When you are hired by the company, you are considered a probationary associate for a period of time specified at your facility. It is during this period you should establish the good work habits you want to maintain throughout your career with the company. You may be transferred, laid off or dismissed

during this period if it becomes apparent to your supervisor/ manager that the employment relationship between you and the company is not one that is beneficial to both.

This policy does not in any way alter the at-will nature of the employment relationship, which includes the right of either the associate or the company to terminate employment at any time, with or without cause.

QUALITY

Quality is one of Timken's core values, along with Ethics and Integrity, Teamwork and Excellence. Quality is part of our overall goal to strengthen the company for future growth. The need to ensure consistent quality increases as we continue to grow.

Our quality policy states: "Quality is the cornerstone of our reputation and is central to the ability of each business to achieve its mission.

Every associate understands the importance of the Timken brand (awareness), consistently produces and delivers what we promise (execution), and takes responsibility for decisions that impact quality (accountability)."

Our commitment to quality will help Timken:

- Ensure excellence in all it does;
- Deliver lasting value and quality as measured in the eyes of customers;
- · Perform consistently; and
- Ensure the excellence of its associates.

REFERENCES

Timken does not provide professional references for any current or former associate, contingent or contract employee or any third party that may have performed work for the company. Any current or former associate who requires proof of employment by Timken, dates of employment or salary information may direct inquiries to the local human resources representative. The prohibition regarding professional references extends to social media sites such as LinkedIn. Associates may not provide references or recommendations involving current or former Timken colleagues or a third party who has performed work at Timken. Personal references completely unrelated to Timken are at the associate's own discretion.

REPORTING MISCONDUCT

Timken encourages associates to take an active and affirmative role in ensuring the legal and ethical conduct of all Timken associates. To this end, when an associate witnesses or discovers conduct that he or she believes may violate the law, the handbook provisions herein, work rules or other workplace standards, that associate should immediately report such conduct to a manager, supervisor or Associate Relations. Timken will not tolerate any retaliatory conduct directed toward an associate who has voiced, in good faith, a concern regarding a violation of any of the aforementioned standards.

Note: Associates may also use the Timken HelpLine option by calling (800) 846-5363 or 1-888-732-1439 or via email by logging onto www.timkenhelpline.com.

SAFETY

All safety regulations are enforced in our facilities. These are for your own protection as well as for the protection of your fellow associates. In certain designated areas and departments of our facilities, approved personal protective equipment, such as eye and hearing protection, is required. To obtain prescription safety glasses, it is necessary to present a copy of your prescription to medical services, your manager/supervisor, or a human resources representative. The prescription cannot be more than two years old.

SCHOLARSHIP PROGRAM (TIMKEN GLOBAL)

The Timken Company Charitable and Educational Fund, Inc. offers a competitive global scholarship program for sons and daughters of eligible associates. The Timken Company Global Scholarship Program is part of the company's commitment to recognize achievement inside and outside the classroom and start the sons and daughters of its associates on their way to a successful career.

Applications are evaluated by an independent consultant based upon many areas of achievement, both inside and outside the classroom.

Details of the program, including eligibility requirements, are available at http://www.timken.com/scholarship.

SECURITY PRACTICES/CONFIDENTIAL INFORMATION

Management relies on the good faith and awareness of all associates for the protection of the company's assets against theft, espionage, unauthorized disclosure, acts of violence and other improper acts. You may be among those associates who are required to enter into a written agreement with the company whereby, among other things, you assume legal obligations to not disclose information obtained in confidence in the course of employment.

If you have any questions regarding these company practices or your responsibility to the company, refer to the Information Security Policy section of this handbook or contact your manager/supervisor.

SMOKING/TOBACCO

Smoking, vaping and the use of tobacco or nicotine products are prohibited in all company plants and offices unless approved by the company for smoking cessation. The use of electronic nicotine or tobacco delivery systems including but not limited to cigarettes, cigars, hookahs and pipes are prohibited. For the smoke-free, vape-free and/or tobacco-free policies that apply at your facility, please contact your manager/supervisor or human resources representative. This policy applies to all associates, visitors, temporary workers and contractors.

SOLICITATION/DISTRIBUTION

No associate is permitted to conduct any type of solicitation or engage in the distribution of literature in work areas during "working time." "Working time" includes the work time of the associate doing the soliciting or distributing, as well as the work time of the associate or associates to whom the soliciting or distributing is directed.

Canvassing, collecting funds, soliciting pledges, circulating petitions, soliciting membership in any organization or any other similar activity, for personal profit or charitable organizations, is not permitted unless pre-approved in writing by Associate Relations.

In addition, trespassing, soliciting and distributing literature by anyone who is not directly employed by Timken are prohibited on company premises at all times. Any individual desiring to do business with Timken must be handled according to the company's visitor policy.

Notwithstanding the foregoing, nothing in this handbook or any of the company policies set forth in this handbook shall be construed to limit, in any way, your rights under applicable federal, state or local laws, including, but not limited to the National Labor Relations Act and your right to organize or engage in protected concerted activity, including the discussion or sharing of information related to wages, hours, or other terms and conditions of employment.

TEAMWORK

Teamwork and cooperation among associates and departments is of the greatest importance. When you join the company, you become a member of the team.

TELECOMMUTING

Telecommuting can be an effective management tool that provides flexibility in meeting customer and associate needs and business goals. Timken will assess and evaluate the option of telecommuting where such alternate work schedules will not significantly impact operational, departmental or customer requirements. Participants must complete a telecommuting agreement and receive approval from Associate Relations. For the actual policy, contact your human resources representative.

TIME RECORDING

You can swipe your badge to clock in for your scheduled shift no more than 18 minutes before your scheduled shift begins and you can swipe your badge to clock out no later than 18 minutes after your scheduled shift ends. You are not to perform any work in the plant outside of your scheduled shift unless authorized by a supervisor. If you should work any time before or after your scheduled shift, you are required to let your supervisor know so you may be compensated properly. If you leave the plant anytime during your scheduled shift (including lunch periods), you are required to swipe your badge.

Under no circumstances are you permitted to swipe another associate's badge or are you permitted to allow someone else to swipe your badge for you. Salaried associates who use the Kronos system must record their work hours appropriately.

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Your electronic timecard should reflect your exact hours worked. All absences, vacation, adjustments to your work schedule, etc. need to be marked accurately.

UNIONS

Your company feels that it is appropriate that you understand our position concerning you and labor unions. We feel that unions offer no advantage to you because of our company practice of providing a wide range of benefits, excellent working conditions and a fair salary for your work.

We know that you can express your problems, and we can understand each other more clearly if a union is not placed between us. We want you to speak for yourself and directly to us.

VISITOR POLICY

Access to our premises is limited to persons who have a legitimate reason to be present. Unauthorized persons, including personal friends or relatives, may disrupt operations or even pose a risk to the company or its associates.

All third parties, including but not limited to vendors, suppliers, contractors, consultants, clients, and all other non-Timken associates (collectively referred to as "visitors"), must sign the visitor log found at the reception desk before being escorted into the facility beyond the reception area. After completing the visitor log, the visitor will be assigned a visitor badge, which the visitor must wear at all times while on company premises. Visitors must be accompanied at all times while they are on company premises, unless otherwise authorized by a manager/supervisor. Associates are responsible at all times for the whereabouts and conduct of their visitors.

If you notice an unauthorized person, or witness conduct you deem suspicious, you must immediately report the situation to your manager/supervisor. If you believe there is a threat to any individual's safety, you should call security or the police immediately.

WORKERS' COMPENSATION

Workers' Compensation benefits are provided for occupational diseases and injuries received in the course

of and arising out of your employment. These benefits, including medical and hospital care and compensation for lost time resulting from the injury or occupational disease, are provided to you in compliance with the laws of the state in which you are working. They are made available through contributions by the company without cost to you. Contact your Human Resources representative for more details.

WORKPLACE VIOLENCE

The company is committed to providing a safe workplace for all associates. To ensure a safe workplace and to reduce the risk of violence, all associates should review and understand all provisions of this workplace violence policy.

Prohibited Conduct

Timken does not-and will not-tolerate any type of workplace violence committed by or against associates. Associates are strictly prohibited from making threats of violent acts or engaging in conduct that explicitly or implicitly suggests violent acts.

The following list of behaviors, while not inclusive, provides examples of conduct that is strictly prohibited:

- Possession of a weapon, including lawfully licensed concealed carry firearms (except as expressly allowed by law), while on company premises or while on company business;
- · Causing physical injury to another person;
- Making threatening or intimidating remarks suggesting violence, bodily harm or bodily injury;
- Aggressive or hostile behavior that creates a reasonable fear of injury to another person;
- Intentionally damaging employer property or property of another associate, vendor/supplier, contractor or other third party; or
- Committing acts motivated by, or related to, sexual or other harassment or domestic violence.

Any associate who displays any of the aforementioned examples, a tendency to engage in violent, abusive or physically threatening behavior or who likewise engages in behavior that the company, in its sole discretion, deems

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similarly inappropriate will be subject to disciplinary action, up to and including termination.

Reporting Procedure

Any potentially dangerous situations must be reported immediately to any manager/supervisor or to human resources. Reports can be made anonymously and all reported incidents will be investigated. Reports or incidents warranting confidentiality will be handled appropriately and information will be disclosed to others only on a need-to-know basis. All parties involved in a situation will be counseled, and the results of investigations will be discussed with them. The company will actively intervene, to the extent possible, at any indication of a possible hostile or violent situation.

The company will not condone any form of retaliation against an associate for making a report pursuant to this policy and any such retaliation will subject the offending associate to disciplinary action, up to and including termination.

Risk Reduction Measures

Hiring. The company takes reasonable measures to conduct background investigations to review candidates' backgrounds to the extent necessary and consistent with and related to the requirements of the job and business necessity.

Individual Situations. We do not expect associates to be skilled at identifying potentially dangerous persons. Associates are expected to exercise good judgment and to inform their manager/supervisor or human resources/manager if any associate exhibits behavior that could be a sign of a potentially dangerous situation. Such behavior includes:

- Bringing weapons, including lawfully licensed concealed carry firearms (except as expressly allowed by law), onto company premises or possessing weapons while on company business;
- Displaying overt signs of extreme resentment, hostility, aggression or anger;
- Making threatening, intimidating or violent remarks;
- Displaying irrational or inappropriate behavior.

Prevention Training. The company requires all associates to complete workplace violence prevention training. This training includes an overview of the company workplace violence program and helps the associates become familiar with warning signs, stressors, and how to report concerns.

Enforcement

Threats of violence, threatening conduct or statements, or any other acts or statements of aggression or violence in the workplace or while on company business will not be tolerated. Any associate determined to have committed such acts will be subject to disciplinary action, up to and including termination.

Non-Associates

Non-associates engaged in violent acts on the employer's premises will be reported to the proper authorities and prosecuted to the fullest extent of the law

QUESTIONS ABOUT THE HANDBOOK

QUESTIONS ABOUT THE HANDBOOK

For questions concerning any sections in this handbook, contact Associate Relations at the company's headquarters.

TIMKEN

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 bearings, gear drives, automated lubrication systems, belts, brakes, clutches, chain, couplings, linear motion products and related power transmission rebuild and repair services.