



TIMKEN



STANDARDS OF BUSINESS ETHICS
OUR CODE OF CONDUCT



CONTENTS

3 INTRODUCTION

- 3 Our Mission, Vision and Values
- 4 Message from our President and Chief Executive Officer
- 5 Message from our Ethics and Compliance Office
- 6 *Turning Ethics into Action: Ethics and Integrity Defined*
- 6 We are All Responsible for *Turning Ethics into Action*
- 6 Associate Performance: Our Leadership Competencies
- 7 Resolving Ethical Dilemmas

8 SEE SOMETHING? SAY SOMETHING! OUR ETHICS REPORTING RESOURCES

- 8 Reporting Concerns and Seeking Guidance
- 8 Open Door Policy
- 8 Our Ethics Reporting Resources
- 9 Timken HelpLine
- 9 How Reports are Handled
- 9 Non-Retaliation Policy

10 TURNING ETHICS INTO ACTION IN OUR WORKPLACE

- 12 Diversity and Global Inclusion
- 13 Environmental, Health and Safety
- 14 Drug and Alcohol-Free Workplace
- 15 Wage and Hour
- 15 Workplace Violence
- 16 Company Assets and Information
- 17 Technology, Social Media, and Expectations of Privacy
- 18 Data Privacy

19 TURNING ETHICS INTO ACTION WITH OUR CUSTOMERS AND SHAREHOLDERS

- 21 Fair Dealing, Promotion and Advertising
- 22 Product Quality
- 23 Government Customers
- 24 Record Retention
- 25 Accurate and Complete Financial Records
- 26 Cooperation with Auditors, Responding to External Requests
- 26 Public Reporting and Communication
- 27 Insider Trading
- 28 Intellectual Property of Others
- 29 Antitrust and Competition Laws
- 30 Conflicts of Interest

31 TURNING ETHICS INTO ACTION WITH THE GLOBAL COMMUNITY

- 33 Global Citizenship
- 34 Political Contributions
- 35 Corruption and Bribery
- 36 Giving and Receiving Gifts and Entertainment
- 37 Global Trade Regulations

38 CONCLUSION

- 38 Additional Information and Resources
- 38 Compliance with Our Code of Conduct, the *Standards of Business Ethics* Policy
- 38 Applying for Waivers
- 38 Future or Ongoing Amendments
- 39 Timken HelpLine Telephone Numbers
- 39 Ethics and Compliance Office Contacts

INTRODUCTION

Our Mission

We use our knowledge to make the world's industries work better.

Our Vision

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

Our Values

Teamwork / Ethics & Integrity / Quality / Excellence



Message from our President and Chief Executive Officer



The Timken Company is known for our long-standing reputation as an ethical company. Each one of us has played a part in building this reputation and we must guard and protect our reputation by continuing to demonstrate our core value of ethics and integrity in everything we do. When we act with ethics and integrity, we show that we deserve the trust and confidence our fellow associates, customers and shareholders have placed in us.

Our code of conduct, the *Standards of Business Ethics* policy, is based on our values and is an important tool to aid us in conducting business. It is a guide not only for us as associates but also for our board of directors, our suppliers, and for everyone with whom we do business. Therefore, it is critical that we understand the principles in the *Standards* and use the policy as a resource to shape our decisions and actions. The foundation of our core value of ethics and integrity is the expectation to do what is right, regardless of whether or not a specific situation is covered in the *Standard of Business Ethics* policy. When making decisions, I encourage you to reference this policy and contact one of our ethics reporting resources if you need additional guidance.

When we work together to win together, we are at our best and our company becomes stronger than ever. Thank you for joining me in ensuring that our actions always reflect our desire to win with integrity and provide the very best the company has to offer.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Kyle". The signature is written in a cursive, professional style.

Richard G. Kyle,
President & CEO

Message from our Ethics and Compliance Office



The Timken *Standards of Business Ethics* policy, our Company's code of conduct, serves as a guide for conducting business in a way that is consistent with our values and reinforces our commitments to one another, our customers, our suppliers and in the communities where we work. It is our responsibility to make sure that our business decisions and actions comply at all times with the spirit as well as the letter of this policy and the law.

While the *Standards* cannot address every potential situation and dilemma, it is a valuable resource for providing direction when you have questions or concerns. As a member of our team, you play an important role in upholding our principles of honesty, fairness, respect and responsibility, and the Company counts on you to speak up if you see anything that may compromise our high standards. If you have a question about or need guidance related to a workplace situation or you believe unethical or questionable business activity or behavior is occurring, please contact one of our ethics reporting resources listed in this guide without fear of retaliation.

Thank you for joining me in *Turning Ethics into Action* at The Timken Company and reaffirming your commitment to our core value of ethics and integrity in all that you do.

Sincerely,

A handwritten signature in black ink that reads "Grace Ho". The signature is written in a cursive, flowing style.

Grace Ho

Senior Corporate Attorney – Ethics and Compliance



ETHICS AND INTEGRITY DEFINED

Our code of conduct, the *Standards of Business Ethics* policy, is a framework for *Turning Ethics into Action*. This means that each of us must uphold the following principles, which define our core value of ethics and integrity.

HONESTY

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

FAIRNESS

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

RESPECT

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

RESPONSIBILITY

We are guardians of Timken's outstanding reputation for ethics and integrity. We act responsibly, exercise sound judgment and do what is necessary to preserve and enhance that reputation. We do not wait for others to tell us what we need to do. We follow our *Standards of Business Ethics* and understand how the law affects our actions.

WE ARE ALL RESPONSIBLE FOR TURNING ETHICS INTO ACTION

All of us must act according to the principles set forth in our code of conduct, the *Standards of Business Ethics* policy. This includes all associates, directors and officers of The Timken Company and its affiliates and subsidiaries. We also expect everyone working on our Company's behalf to adhere to our ethical standards, including consultants, agents, suppliers and business partners.

ASSOCIATE PERFORMANCE: OUR LEADERSHIP COMPETENCIES

Our commitment to *Turning Ethics into Action* is reflected in our Company's leadership competencies model, which sets standards for associate performance. The behaviors associated with **business ethics, integrity and trustworthiness** are clearly identified at each level of the leadership pipeline as an element of the "Professional Impact" competency.

RESOLVING ETHICAL DILEMMAS

WHEN YOU FACE AN ETHICAL DILEMMA, ASK YOURSELF THE FOLLOWING QUESTIONS:

Our code of conduct, the *Standards of Business Ethics* policy, addresses the most common legal and ethical issues you may encounter. However, not every situation can be addressed here. You should use your best judgment in each case and seek guidance when you are uncertain of the appropriate action. If you encounter something that conflicts with the standards, or with your own conscience, you should speak up.



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



EXAMPLES OF SITUATIONS YOU SHOULD REPORT:

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

OUR ETHICS REPORTING RESOURCES

REPORTING CONCERNS AND SEEKING GUIDANCE

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

OPEN DOOR POLICY

Our open door policy supports an environment that encourages you to ask questions and report concerns. When you have a question or concern, speak with a supervisor or manager with whom you feel comfortable. Our open door policy reflects our expectation of supervisors and managers to listen and respond to questions and concerns. If you feel your concerns or questions have not received proper consideration, or if you do not feel comfortable speaking to your supervisor or manager, you may also speak with any ethics reporting resource.

OUR ETHICS REPORTING RESOURCES

To support you in *Turning Ethics into Action* in your job, the following additional ethics reporting resources are available for reporting concerns and seeking guidance:

- Your supervisor or manager
- A member of the human resources team
- Any member of management or Company leadership
- The ethics and compliance office at ethics@timken.com
- The law department at lawcenter@timken.com
- The Timken HelpLine (anonymously, if desired) at 1-800-846-5363 or at www.timkenhelpline.com

REMEMBER:

If you are aware of or suspect unethical or illegal conduct, you have a duty to report the issue or seek guidance.



TIMKEN HELPLINE

We recognize that there may be times when you might be reluctant to discuss concerns or questions with your supervisor or another individual inside the Company. For this reason, the Timken Helpline has been established and is available online and via telephone.

The Timken Helpline is answered by an external third party who receives your questions and concerns and forwards the information to a representative from our Company who will then conduct an independent investigation. Reports made to the Timken Helpline are not traced or recorded. You are encouraged to report your concerns, sharing as much information as possible, including your name and contact information, so that we can conduct a thorough investigation. However, even if you are not comfortable sharing your name, your report is still valuable. Therefore, you may choose to submit it anonymously, where allowed by local law. If you do so, you will receive a reference number to check the status of your report.

You may contact the Timken Helpline by telephone or submit a report online at www.timkenhelpline.com. A list of country specific phone numbers for the Timken Helpline is available at the end of this document.

HOW REPORTS ARE HANDLED

We investigate all reports promptly, thoroughly and fairly, and take action when appropriate. We expect you to participate in investigations when asked. Keep in mind that every effort is made to safeguard confidentiality both during and after the investigation. However, in order to conduct an effective investigation and take proper corrective measures to stop unethical or unlawful conduct, we may need to disclose certain sensitive information on a need-to-know basis. At the conclusion of the investigation, we will take any appropriate corrective or remedial action necessary to end any unlawful or unethical activity that may have occurred.

NON-RETALIATION POLICY

You should never fear retaliation. We do not tolerate acts of retaliation for any legally protected activity against anyone who makes a good faith report or who participates in an investigation. Making a report in “good faith” means that the information you provided is complete and accurate, and you believe it to be true. Individuals who are responsible for, or who participate in, retaliation could be subjected to disciplinary action, up to and including termination. If you believe you have experienced retaliation, report it to one of our ethics reporting resources immediately. Anyone making a report not in good faith could also be subject to disciplinary action.

RETALIATION DEFINED

Retaliation could occur when adverse actions are taken against an associate because they raised a concern in good faith or participated in an investigation. Examples of adverse actions include, but are not limited to:

- Discipline, including termination and demotion
- Threats
- Negative performance reviews
- Denying promotions or benefits
- Exclusion from meetings or Company activities



TURNING ETHICS INTO ACTION **IN OUR WORKPLACE**

At Timken, the strength of our people and reputation define us. We are committed to fostering a dynamic environment where our core values are celebrated and where we all work together to contribute to Timken's success.

TURNING ETHICS INTO ACTION **IN OUR WORKPLACE MEANS...**

- We value diversity and diverse perspectives.
- We treat one another with professionalism, dignity and respect.
- We are honest.
- We protect the environment.
- We work safely.
- We protect the security and confidentiality of personally identifiable information and Company confidential information.
- We protect our Company's assets and do not use them for our own personal gain.



HARASSMENT DEFINED

Harassment refers to unwelcome conduct that creates an intimidating, offensive or hostile work environment, or unreasonably interferes with someone's work. Harassment can take many forms, including physical actions, spoken and written remarks, and videos or pictures.

Sexual harassment includes unwelcome sexual advances, requests for sexual favors or other physical or verbal conduct of a sexual nature.

DIVERSITY AND GLOBAL INCLUSION

We value a diverse, global workforce and an inclusive work environment that reflects our customers and communities. Collectively, we represent a variety of backgrounds, education levels and thinking styles. Our diversity enhances our ability to create innovative business and product solutions, driving stronger performance and shareholder return. We treat all associates and applicants equally according to their individual qualifications, abilities, experiences and other employment standards. We do not tolerate discrimination or harassment, regardless of where it takes place. Both are prohibited on Company premises, as well as in off-hours or off-site business-related functions, such as business travel or Company events.

Business decisions are made solely based on merit and not due to race, religion, color, national origin, ancestry, genetic information, gender, gender identity, age, sexual orientation, disability, veteran/military status or any other basis prohibited by applicable law. We 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.

OUR POLICIES AGAINST DISCRIMINATION AND HARASSMENT REQUIRE THAT:

- ✓ We provide a work environment free from all types of unlawful discrimination and harassment.
- ✓ You report to a supervisor, manager or any other ethics reporting resource, any conduct that you observe that may constitute harassment or discrimination.



ADDITIONAL RESOURCES:

- Associate Relations Department
- Human Resources Department
- [Harassment Policy](#)
- [Discrimination Policy](#)
- Ethics Reporting Resources

ENVIRONMENTAL, HEALTH AND SAFETY

We conduct business with care for the environment and for the health and safety of each other, our suppliers, our customers and the people in the communities where we operate. We are committed to continuously improving our environmental, health and safety (EHS) performance and to holding ourselves accountable to a high, global standard. By doing so, we will create a safe and healthy workplace, take responsible care of environmental resources and develop sustainable technologies and business practices that contribute to global economic growth and prosperity.

ADDITIONAL RESOURCES:

- [Environmental, Health and Safety Department](#)
- [Your Facility's Environmental or Safety Coordinator](#)
- [Environmental, Health and Safety Policy](#)
- [Environmental, Health and Safety TimkeNet Site](#)
- [Medical Services Department](#)
- [Community Relations Department](#)
- [Ethics Reporting Resources](#)

OUR ENVIRONMENTAL, HEALTH AND SAFETY POLICIES AND OBJECTIVES REQUIRE THAT:

- ✓ We comply with all EHS laws, regulations, Company policies and standards.
- ✓ We make EHS performance a priority in our business and operations planning.
- ✓ We strive to ensure that our vendors, suppliers and contractors always conduct their activities safely and responsibly and we help them do this by providing them with education and training.
- ✓ We support environmental sustainability through pollution prevention, waste management, recycling, energy conservation and energy-saving product innovations in friction management and power transmission.
- ✓ You look for ways to reduce energy consumption and waste across the Company, for example by recycling materials such as scrap metal, office paper, aluminum cans, wooden pallets, and plastic bottles.

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





DRUG AND ALCOHOL-FREE WORKPLACE

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

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

ADDITIONAL RESOURCES:

- [Drug and Alcohol Policy](#)
- Your Facility's Safety Coordinator or HR Manager
- Corporate Health and Safety Department
- Medical Services Department
- Employee Assistance Program
- Ethics Reporting Resources

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

OUR DRUG AND ALCOHOL POLICY REQUIRES THAT:

- ✓ You not use, be under the influence of, possess or distribute illegal drugs, controlled substances or alcohol while on Company premises or when conducting Company business.
- ✓ You only use lawfully prescribed medication when it does not impair your ability to perform your job or pose a direct threat to yourself or others in the workplace.
- ✓ We maintain a drug-and alcohol-free workplace. The only exception to this policy arises when alcohol is consumed at authorized work-related events. In such cases, you may only consume alcohol in moderation and must maintain professional behavior.
- ✓ You notify a supervisor or manager if you have reason to believe illegal drugs, controlled substances or alcohol are being used on premises or while conducting Timken business.



WAGE AND HOUR

We comply fully with applicable wage and hour laws including those related to overtime and maximum hour regulations and apply any exemptions from such wage and hour requirements in good faith. To help us comply with these laws, if you are required to track your hours worked, you must maintain accurate records of those hours. If you are a supervisor or manager, you are expected to ensure time records accurately reflect hours worked and be familiar with all of the wage and hour laws that might affect our operations.

OUR WAGE AND HOUR POLICIES REQUIRE THAT:

- ✓ You record your hours worked accurately.
- ✓ We comply with all overtime and maximum hour laws and regulations.
- ✓ We apply any exemptions from wage and hour requirements in good faith.
- ✓ We fully respect all applicable laws that set a minimum wage for employment.
- ✓ We are familiar with and honor wage and hour laws that could affect our operations.

ADDITIONAL RESOURCES:

- Associate Relations Department
- Corporate Payroll Department
- Law Department
- [Overtime Pay Policy](#)
- [Lactation Policy](#)
- Ethics Reporting Resources

WORKPLACE VIOLENCE

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

OUR POLICY AGAINST WORKPLACE VIOLENCE REQUIRES THAT:

- ✓ You never make threats or engage in violent, threatening or intimidating behavior.
- ✓ You do not engage in aggressive or hostile behavior that creates a reasonable fear of injury to another person.
- ✓ You do not bring prohibited weapons, including lawfully licensed firearms, on Company property, or possess them while on Company business.
- ✓ You do not cause physical injury to another person.
- ✓ You do not intentionally damage Company property or property of another associate, vendor/supplier, contractor or other third party.

ADDITIONAL RESOURCES:

- Associate Relations Department
- [Workplace Violence Policy](#)
- Your Facility's Safety Coordinator
- Corporate Health and Safety Department
- Medical Services Department
- Ethics Reporting Resources

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

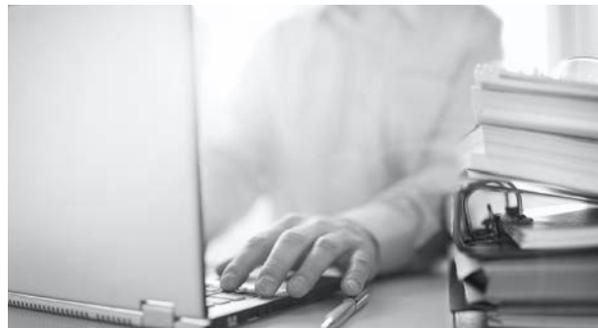
INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION DEFINED

“Intellectual property” and “confidential information” generally include any non-public information that, if revealed, might benefit our competitors and harm our Company. Examples include trade secrets, new product research, specific technical, design or process data, patents, pricing information, business plans, merger and acquisition plans, manufacturing formulas, customers and supplier lists.

COMPANY ASSETS AND INFORMATION

As a part of your job, you have access to many Company assets, both tangible and intangible. These include our facilities, equipment, materials, property, technology, information and intellectual property. Although we do allow for nominal personal use of some Company assets, you should use our assets primarily for business purposes. You have an obligation to protect our assets from loss, damage, theft, unauthorized or improper use, and waste.

Timken’s intellectual property and confidential information are some of our most valuable assets. You are expected to exercise sound judgment when using these assets and take all necessary precautions to protect them from disclosure. By safeguarding our intellectual property and confidential information, you are helping protect our brand and reputation from damage.



ADDITIONAL RESOURCES:

- [Timken Intellectual Property and Security Guidelines](#)
- [Timken Company Information Security Policy](#)
- [Timken Branding Policy](#)
- Communications Department
- Associate Relations Department
- Law Department
- Ethics Reporting Resources

OUR INFORMATION AND SECURITY POLICIES REQUIRE THAT:

- ✓ You exercise sound judgment and take care when using Company assets and information to guard against loss, waste, damage, disclosure or misuse.
- ✓ You use Company assets primarily for business purposes and to fulfill your job responsibilities.
- ✓ You use Company non-public information exclusively for business purposes and to fulfill your job responsibilities.
- ✓ You understand how to recognize the Company’s intellectual property and learn how to safeguard it.
- ✓ You understand that protecting our intellectual property, including patents, trademarks, copyrights and trade secrets, are key to our continued success.
- ✓ You are cautious when discussing confidential information and never discuss or expose it in public places.
- ✓ You never disclose confidential information to anyone outside of the Company or even someone within the Company who does not have a clear business need to know.
- ✓ You follow our branding policy when using Company trademarks and other brand identifiers.

TECHNOLOGY, SOCIAL MEDIA, AND EXPECTATIONS OF PRIVACY

Our information technology systems, including our electronic communication systems, are essential business tools that help you work efficiently and productively. When using these tools, you have a responsibility to conduct yourself appropriately, ethically, and within the law. The use of these assets requires you to be careful and ensure that their usage is consistent with good business practices and our company policies and does not disrupt business operations. It is important to remember that our information technology systems, electronic communication systems, and all of the data or information they contain, are Company property. This includes all information and correspondence sent through, received by or stored within our Timken electronic mail or voicemail accounts. It also includes the information you create, send, receive, process or store on Company technology such as laptops, phones and other systems and devices.

We recognize that occasions arise where you may need to contact a family member or other people while at work. Therefore, reasonable personal use of our Company's electronic communications systems is permitted. Such use must not:

- Interfere with Company business
- Relate to a personal business venture
- Otherwise violate our code of conduct or any other policy of the Company

Social media provides an opportunity to connect with others but can sometimes blur the line between professional and personal activity. While the Company does not seek to control your personal participation in social media that you engage in on your own time, you must be sure not to give the impression that the views and opinions expressed online are also those of Timken. You must also ensure that your personal participation in social media does not create risks to Timken's reputation and that you never disclose proprietary or confidential information.

OUR POLICIES REGARDING USE OF THE COMPANY'S INFORMATION TECHNOLOGY AND ELECTRONIC COMMUNICATIONS SYSTEMS REQUIRE THAT:

- ✓ You use the Company's information technology systems and assets to communicate professionally, appropriately and within the scope of your job.
- ✓ You understand that our information technology systems and assets, including all data or information they contain, are Company property.
- ✓ You keep the Company's proprietary and confidential information secure at all times.
- ✓ You store electronic confidential information and intellectual property in an encrypted format.
- ✓ You never use social media or any Company information technology system or asset to defame or harass anyone, including other associates, customers, suppliers, competitors or others with whom we do business.
- ✓ You keep in mind that information sent or received using any of our Company's information technology systems or assets is not private.
- ✓ You remember that your activity on the Company's information technology systems may be monitored to ensure these resources are used appropriately.

NO EXPECTATION OF PRIVACY

When using the Company's information technology systems or assets, such as the Company's electronic mail, instant messaging systems, computers, cell phones and voicemail, you should not expect the information sent, received or stored to be private. Where allowed by local law, Timken reserves the right to monitor, access, review, and manage your activities to make sure these resources are used appropriately and in accordance with company policies. The Company also reserves the right to block access to websites, as well as the transmission of emails or files.

ADDITIONAL RESOURCES:

- [Timken Company Information Security Policy](#)
- [Use of Company Information Technology Assets Policy](#)
- [Electronic Communications Policy](#)
- Communications Department
- Associate Relations Department
- Ethics Reporting Resources

PERSONAL INFORMATION DEFINED

“Personal information” includes the data contained in our personnel records, medical records and credit or banking information.

DATA PRIVACY

We are committed to protecting the security and confidentiality of the data people entrust to us. This includes the personal information you provide to the Company, as well as information we receive from our customers, suppliers and other third parties with whom we do business. We comply with all applicable data protection and privacy laws.

OUR PRIVACY POLICIES REQUIRE THAT:

- ✓ We protect the privacy and security of any personal information that we collect, store, process, transmit, share or discard.
- ✓ You never share the personal information placed in your trust with anyone who does not have a clear business need to know unless you have received prior approval from the law department or business process owner.
- ✓ You never leave personal information about yourself or others – such as performance management documents, salary information, expense reports or medical information – unsecured on a laptop, phone, or other system or in a location accessible by an unauthorized person.



ADDITIONAL RESOURCES:

- Human Resources Department
- Associate Relations Department
- [Privacy Policy](#)
- Law Department
- Ethics Reporting Resources



TURNING ETHICS
INTO ACTION
**WITH OUR CUSTOMERS
AND SHAREHOLDERS**

We hold ourselves accountable for conducting business with the highest ethical standards and delivering exceptional products and services. This means we make the right decisions in our business activities and strive to be the best we can be in a world where our core values guide our actions.



TURNING ETHICS INTO ACTION **WITH OUR CUSTOMERS AND SHAREHOLDERS MEANS...**

- We deal fairly and honestly with our customers, suppliers and business partners.
- We make only those commitments and promises that we can keep – and we honor them.
- We comply with applicable legal and ethical requirements in our dealings with customers everywhere in the world.
- We produce products that meet our quality standards and speak up if we discover an actual or potential product quality or safety issue.
- We maintain financial records that are accurate, complete and timely issued.
- We cooperate with internal and external auditors, internal investigations and government inquiries.
- We respect the intellectual property rights of others.
- We obtain competitive information legally and ethically and comply with global competition laws.
- We avoid conflicts of interest.
- We adhere to record retention guidelines.



FAIR DEALING, PROMOTION AND ADVERTISING

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

Timken has become an industry leader based on the quality of the service provided by our associates and the products we offer. We retain business by fulfilling our commitments and following through on our promises and honoring our contractual obligations.

ADDITIONAL RESOURCES:

- [Gifts and Entertainment Policy](#)
- [Communications Department](#)
- [Law Department](#)
- [Ethics Reporting Resources](#)

OUR SALES AND MARKETING POLICIES REQUIRE THAT:

- ✓ We compete solely on the merits of our products and services and promote them accurately and honestly, only making comparisons of our products or services that are accurate and supported by facts.
- ✓ We never make false or misleading statements or innuendo about our competitors, their products or their services.
- ✓ We supply only honest and truthful information to our suppliers and other business partners and we never misrepresent facts in order to gain a competitive advantage.
- ✓ We use legal and ethical methods to gather competitive information.
- ✓ We never offer our customers – or their employees – benefits, rewards or anything of value that may violate the law, our policies or the customers' policies.
- ✓ You only offer a gift or entertainment if it is nominal, customary, infrequent, legal and its public disclosure would not cause embarrassment to you or the Company.
- ✓ You ask questions and report any anti-competitive practices or unfair business dealings.



PRODUCT QUALITY

The Timken brand and our growing portfolio of many strong industrial brands is respected across the world. Our products are used in a wide variety of demanding applications, and our customers trust us to provide products of high performance and consistent quality.

OUR PRODUCT QUALITY POLICIES REQUIRE THAT:

- ✓ You diligently utilize and follow our total quality management system (TQMS) and act with integrity, from design to manufacturing to distribution of our products.
- ✓ We ensure all products satisfy appropriate Company standards and agreed customer requirements.
- ✓ We follow all product specifications.
- ✓ We adhere to production processes and quality control procedures.
- ✓ We comply with all applicable product laws, regulations and industry standards that govern product and process specifications.
- ✓ We conform to all product storage, handling and shipping policies and procedures.
- ✓ We employ monitoring systems for product and process compliance.
- ✓ You report concerns or suggestions regarding standards or procedures.



ADDITIONAL RESOURCES:

- [Quality Department](#)
- [Market or Product Managers](#)
- [Chief Engineers](#)
- [Facility Quality Managers](#)
- [Quality Policies and Procedures](#)
- [Ethics Reporting Resources](#)

GOVERNMENT CUSTOMERS

At Timken, we serve governments and state-owned entities around the world. We value our relationships with these customers and are committed to complying with all applicable legal and ethical requirements. If you work on or support government contracts, you should be aware that special rules and regulations apply. For example, orders and contracts with governments may contain obligations beyond those found in typical commercial contracts.

Some of these obligations may include:

- Disclosure of cost and pricing information
- Limits on citizenship of individuals who can access technical data
- Safeguards and restrictions related to information classified for national security
- Limits on where raw materials may be acquired
- Priority of orders for national defense
- Restrictions on personal and organizational conflicts of interest
- Rules related to the employment by the Company of current or former government employees
- Rules related to timekeeping, accounting, workplace behavior, safety and drug-free workforce
- Requirements to flow down contractual obligations to our suppliers

ADDITIONAL RESOURCES:

- Government Affairs Office
- Law Department
- Ethics Reporting Resources

OUR POLICIES REGARDING INTERACTIONS WITH NATIONAL, REGIONAL OR LOCAL GOVERNMENTS REQUIRE THAT:

- ✓ We remember and follow the foundational rules of government contracting.
- ✓ We maintain the highest level of integrity in dealing with government employees.
- ✓ We ensure honesty in exchanges of information.
- ✓ We develop and maintain proper relationships with third parties.
- ✓ We promote openness and fairness in competition.
- ✓ You consult Timken sales management before pursuing or accepting government orders or contracts, to ensure any such obligations are followed.

If you contact elected or appointed national, regional/state, local or other officials and employees to promote our products or services for sale to a government agency, or to seek government assistance such as grants or incentives, you must first contact the government affairs office.





RECORD RETENTION

We are committed to maintaining our records in accordance with all legal and business requirements. All records should be either retained or destroyed according to our record retention policy. In some cases, records we possess may relate to pending or threatened investigations, lawsuits or other proceedings. These records must be maintained and may not be altered or destroyed. If you receive a notice that you may have records that are subject to a legal hold, follow the instructions in the hold notice. Do not destroy the records identified.

ADDITIONAL RESOURCES:

- [Record Retention Policy](#)
- [Office Services Department](#)
- [Law Department](#)
- [Ethics Reporting Resources](#)

OUR RECORD RETENTION POLICIES REQUIRE THAT:

- ✓ You notify the law department if you receive a notice of threatened or actual litigation.
- ✓ You maintain records for the time periods required by each local office.
- ✓ You timely and safely destroy records when the retention period expires, unless otherwise directed by the law department or record owner.
- ✓ You preserve records that are subject to a legal hold issued by the law department.



ACCURATE AND COMPLETE FINANCIAL RECORDS

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

OUR FINANCE AND ACCOUNTING POLICIES REQUIRE THAT:

- ✓ We ensure corporate records fairly and accurately reflect all transactions and dispositions of our assets in reasonable detail.
- ✓ We maintain a system of internal controls sufficient to provide reasonable assurances that all transactions and access to corporate assets are only undertaken in accordance with management's authorization.
- ✓ You never delay a necessary entry or make false or artificial entries in any Company books or records for any reason.
- ✓ You never engage in or support any act that results in an entry that is not properly supported.
- ✓ You never use Company credit cards or other Company accounts for personal purchases.
- ✓ You never seek expense reimbursement for personal benefit.
- ✓ You closely review all expense reports, if you are a manager, and always make sure you are comfortable with any unusual transactions or exceptions.



ADDITIONAL RESOURCES:

- Finance and Accounting Policies
- Internal Audit Department
- Law Department
- Ethics Reporting Resources

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

FRAUD DEFINED

Fraud occurs when information is intentionally concealed, altered, falsified or omitted for individual benefit, the benefit of others or to benefit the Company. Fraud, regardless of whether it is for personal benefit or to benefit the Company, is wrong and can lead to disciplinary action, up to and including termination of employment.

WATCHING FOR FRAUD

We all have an obligation to watch for and report signs of fraud, including any situations that could allow fraud to happen. Fraud that occurs at the Company can deplete our assets and damage productivity, brand image, and morale.

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

COOPERATION WITH AUDITORS, RESPONDING TO EXTERNAL REQUESTS

From time to time, you may be asked by a manager, auditor or the government to provide information. You must take these requests seriously and comply with the request. However, if you receive a request for Company information from an external party, such as a government agency, contact the law department for guidance on how to comply before proceeding.

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

OUR FINANCIAL AND ACCOUNTING POLICIES REQUIRE THAT:

- ✓ We fully cooperate and openly communicate with our internal and external auditors.
- ✓ We provide our auditors full and unrestricted access to personnel, facilities, records and other information to do their jobs.
- ✓ You never attempt to control or influence the free flow of information during the audit process.

ADDITIONAL RESOURCES:

- Internal Audit Department
- Law Department
- Ethics Reporting Resources

PUBLIC REPORTING AND COMMUNICATION

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

OUR FINANCIAL AND ACCOUNTING POLICIES REQUIRE THAT:

- ✓ We ensure all disclosures in public reports and documents, including those filed with or submitted to the SEC, are full, fair, accurate, timely and understandable.
- ✓ We understand that each of us, including our Company's chief executive officer, chief financial officer and senior leadership, has a role in establishing and maintaining adequate and effective disclosure controls and procedures.
- ✓ We always provide reliable and accurate information and otherwise support appropriate disclosure practices.
- ✓ You review or certify information, if you are asked to, in a full, accurate and timely manner.
- ✓ You report to management any information you believe should be considered for disclosure in Timken's reports to the SEC, even in the absence of a specific request.

ADDITIONAL RESOURCES:

- Communications Department
- Investor Relations Department
- Corporate Secretary's Office
- Law Department
- Ethics Reporting Resources

INSIDER TRADING

As an associate at Timken, you may have access to material, non-public information about the Company, our customers, or other companies with which we do business. Material, non-public information may be positive or negative and can relate to virtually any aspect of a company's business, including information relating to a company's financial condition, its strategic plans (including acquisitions) or other matters. All such information must be kept confidential and not disclosed without prior authorization from the law department.

Additionally, certain associates, including members of our board of directors and executives, may only trade Company stock during "open window" periods following the public release of the Company's quarterly earnings. These associates are notified each quarter and are subject to the [Statement of Policy Regarding Trading in Stock and Prohibiting the Improper Use or Disclosure of Material Non-Public Information](#).



OUR INSIDER TRADING POLICY REQUIRES THAT:

- ✓ You never buy or sell securities if you have access to material, non-public information about the Company or anyone we do business with. This prohibition applies regardless of the dollar amount of the transaction or the source of the material, non-public information.
- ✓ You protect the information in your care and do not share or provide "tips" to others based upon material, non-public information.
- ✓ You seek guidance from the law department if you have any questions about buying or selling Company stock or what constitutes material, non-public information.

ADDITIONAL RESOURCES:

- [Policy Regarding Trading in Stock](#)
- Law Department
- Ethics Reporting Resources

MATERIAL, NON-PUBLIC INFORMATION DEFINED:

Examples of material, non-public information include:

- Information about changes to senior management
- Plans related to mergers, acquisitions or divestitures
- Pending or threatened litigation
- Substantial purchases, sales or borrowing activities
- Significant regulatory proceedings or governmental investigations
- Financial results before they have been released to the public
- New product development



INTELLECTUAL PROPERTY OF OTHERS

We respect the intellectual property rights of others, just as we expect others to respect our rights.

OUR POLICIES REGARDING THE RESPECT OF INTELLECTUAL PROPERTY OF OTHERS REQUIRE THAT:

- ✓ We honor our obligations pursuant to any non-disclosure agreement, or other contractual obligation, and follow similar procedures for how we protect our own information.
- ✓ We only use customer confidential information for the purpose the customer specifies.
- ✓ You purchase or license all commercial software and do not copy commercial software unless the software license expressly permits copying.
- ✓ You do not copy significant portions of information contained in trade journals and other similar periodicals unless prior permission has been obtained from the copyright holder.
- ✓ You do not use significant portions of commercial music or video CDs or DVDs in Timken's business without first obtaining a license or other permission from the copyright holder.
- ✓ You seek and obtain permission before using others' trademarks or logos.



ADDITIONAL RESOURCES:

- Communications Department
- Law Department
- Ethics Reporting Resources

ANTITRUST AND COMPETITION LAWS

We conduct business with integrity and outperform our competition fairly and honestly. There are many laws, such as antitrust, competition and antimonopoly laws, that govern behavior for competing in the marketplace. These laws are complex and global in reach, but they all work to promote competition and let businesses compete on the basis of quality, price and service. We comply with all competition laws, no matter where we conduct business.

Competition laws prohibit most agreements between competitors, formal and informal. Examples of agreements that would violate these laws include:

- Agreements to fix or maintain prices or pricing levels and other terms of sale.
- Agreements to divide or share any geographic area, product range, category of customers, or to divide or share a particular customer's business.
- Agreements to restrict or increase production.
- Agreements to refrain from selling to or buying from particular individuals or firms.

If you encounter someone representing a competitor who is attempting to enter into a discussion with you about one of the subjects listed above, end the conversation and immediately contact the law department.

Because these prohibitions apply even to informal agreements and understandings, we take steps to minimize our interactions with competitors to just those that are necessary and have a lawful purpose. We avoid communications with competitors that discuss:

- Prices, discounts, rebates, etc.
- Terms and conditions
- Bidding plans and formulas
- Costs
- Production levels
- Marketing plans
- Customers

- Geographic, product or service markets
- Boycotts or other group actions
- R&D investments
- Innovation plans

ADDITIONAL RESOURCES:

- [Antitrust Compliance Policy and Guidelines Document](#)
- [Participation in Trade Associations Policy](#)
- Law Department
- Ethics Reporting Resources

Trade association activities can put associates into contact with competitors. These interactions can have – and are intended to have – legitimate purposes. But whenever competitors interact, there is a risk that they might discuss matters that could give an appearance of anticompetitive agreements. For this reason, we follow our Participating in Trade Associations policy, which requires, among other things, special training for associates participating in trade association meetings and review and approval of any trade association membership by senior management.

OUR ANTITRUST POLICIES REQUIRE THAT:

- ✓ You avoid contact with competitors and their employees, except in those limited situations in which contacts are clearly necessary and for a lawful purpose.
- ✓ You never accept or solicit the disclosure of confidential competitor information from an associate who previously worked for a competitor.
- ✓ We never enter into agreements with competitors on prices or other terms of sale, or to divide or share territories, customers or markets.
- ✓ We never hire a competitor's associate specifically to obtain the competitor's confidential information.
- ✓ We do not discuss with competitors prices or price-related information, information related to bids or proposals, the division or allocation of markets or our business dealings with any third party.
- ✓ You never ask colleagues, customers or business partners to share with you any competitive information they are required to keep confidential.
- ✓ We gather competitive intelligence only in legal and ethical ways.
- ✓ You are knowledgeable of the more detailed and specific laws that apply when we have a dominant market position and seek guidance from the law department in these circumstances.
- ✓ You never solicit or accept competitive information directly from any competitor.
- ✓ You seek guidance from the law department when making arrangements with vendors who are also customers or competitors.
- ✓ We honor any non-disclosure obligations of an associate who previously worked for a competitor.



CONFLICTS OF INTEREST

Your interests and activities outside of work should never interfere with your ability to make the right decisions for Timken. You must avoid situations that conflict or even appear to conflict with the best interest of the Company. A conflict of interest occurs when your personal, financial, or family interests or relationships interfere, or appear to interfere, with your ability to be objective and act in the best interest of the Company.

CONFLICTS OF INTEREST CAN HAPPEN IN SITUATIONS WHERE YOU:

- Conduct business with or supervise family members or friends.
- Participate in outside business interests or employment outside of Timken.
- Take personal advantage of corporate opportunities that Timken might be interested in pursuing.
- Give or receive gifts or entertainment.

ADDITIONAL RESOURCES:

- [Conflict of Interest Policy](#)
- [Law Department](#)
- [Ethics Reporting Resources](#)

OUR CONFLICT OF INTEREST POLICY REQUIRES THAT:

- ✓ You make all business decisions objectively and not for the benefit of yourself, your friends or family.
- ✓ You remove yourself from decisions to hire or supervise family members or friends.
- ✓ You never enter into personal transactions with our customers or suppliers on terms other than those generally available to the public or our Company's associates.
- ✓ You are responsible for your financial interest in Timken's customers, competitors or suppliers and never hold a significant financial interest in those companies.
- ✓ You never make or receive a personal loan or credit with any of our customers, competitors or suppliers or with a director, officer or associate of a customer, competitor or supplier.
- ✓ You never give or receive anything of value in exchange for a favorable business decision.
- ✓ You disclose actual or possible conflicts of interest to your supervisor, manager or other ethics reporting resource.



TURNING ETHICS INTO ACTION **WITH THE GLOBAL COMMUNITY**

We understand that our actions have a direct impact on our global community, and we appreciate the influence that our choices and behaviors can have on others. We believe that being a responsible corporate citizen is central to our purpose and values, and we strive to be good corporate citizens by respecting our workforce, protecting the environment and strengthening the communities where we work. We follow all international trade laws and have no tolerance for corrupt business practices.



TURNING ETHICS INTO ACTION **WITH THE GLOBAL COMMUNITY MEANS:**

- We strive to have a positive impact on the communities where we live and work around the world.
- We behave as good corporate citizens.
- We engage in environmentally sound practices and work to always meet or exceed environmental laws, rules and regulations that govern our business.
- We strengthen the communities where we live and work through our volunteer and charitable activities.
- We comply with the laws prohibiting human trafficking, child and forced labor.
- We conduct business on our own merits and do not engage in corrupt business practices such as bribery or extortion.
- We give and receive gifts in good faith and without the intent to influence a business decision.
- We deliver our products and services in compliance with international trade laws.



GLOBAL CITIZENSHIP

We are committed to being a good corporate citizen and in doing so we operate our business with the interests of our associates, customers, public and local communities in the forefront. By investing in our communities, we create meaningful and positive impacts in the places where we live and work. We watch for possible violations of laws and regulations that govern our employment practices and acceptable treatment of our associates as well as customers and other third parties.

OUR POLICIES REGARDING CORPORATE CITIZENSHIP REQUIRE THAT:

- ✓ We foster a work environment that focuses on safety, quality and environmental responsibility.
- ✓ We seek to better our communities through volunteerism and community leadership.
- ✓ We treat our associates and others with dignity and respect and do not tolerate any form of unacceptable treatment of workers in our operations or facilities.
- ✓ We report and disclose the use of any conflict minerals in our products.
- ✓ We practice responsible sourcing in our supply chain activities.



ADDITIONAL RESOURCES:

- [Timken Conflict Minerals Policy](#)
- Communications Department
- Community Relations Department
- Associate Relations Department
- Ethics Reporting Resources

We recognize the importance of promoting individual health and welfare and watch for indicators of exploitations of children, physical punishment or abuse and involuntary servitude of any person. We do not condone or permit human trafficking, the use of child, forced, indentured or involuntary labor in any of our operations. We expect our suppliers and other third parties to uphold these same standards.

POLITICAL CONTRIBUTIONS

There are times when it makes sense for the Company to participate in government relations or advocate for certain political positions. When we do so as a Company, we comply with all lobbying laws and regulations that apply to corporate political activity.

As an individual, you are encouraged to be involved in the political processes in the communities where you live and work. However, your personal political activity must remain separate from your job responsibilities. When engaging in the political process, you are responsible for doing this on your own time and with your own resources.



“Lobbying” may occur when contacting any elected or appointed federal, state, county, city or other officials and associates to influence legislation, regulations, enforcement activities, special programs, projects and incentives on behalf of Timken. You must first contact the government affairs office before engaging any lobbying activity.

OUR POLICIES REGARDING POLITICAL CONTRIBUTIONS REQUIRE THAT:

- ✓ You use only personal time, resources and funds for personal political activities and do not use Company time, resources or assets.
- ✓ You do not seek reimbursement from the Company for any personal political contributions you may make.
- ✓ You remember that no one in the Company may require you to contribute to, support or oppose any political group or candidate.
- ✓ You only take a public position on government actions on behalf of the Company if you are authorized to do so.
- ✓ You refrain from lobbying government officials unless you have obtained authorization from and coordinate with the Company’s government affairs office.
- ✓ We comply with all U.S. laws that regulate the Company’s involvement in the political process and seek prior approval from the general counsel and government affairs office before Company funds are used in political activities or issue advocacy.
- ✓ We do not make contributions from Timken funds, directly or indirectly, to any political candidates or political organizations.
- ✓ We comply with any registration or disclosure requirements triggered by our political activity.

ADDITIONAL RESOURCES:

- Government Affairs Office
- Ethics Reporting Resources

CORRUPTION AND BRIBERY

We are committed to winning business only on the merits and integrity of our products, services and people. Corruption impedes the development of trustworthy markets and it hurts our Company and the communities where we do business. At Timken, we never engage or participate in corrupt business activities, including bribery.

OUR POLICIES AGAINST BRIBERY AND CORRUPTION REQUIRE THAT:

- ✓ We conduct business on merit alone and do not engage in corrupt business practices such as bribery or extortion.
- ✓ You never give, offer or promise anything of value with the intention of securing an unfair business advantage.
- ✓ You refuse any offer by anyone to make or to take a bribe, kickback or other prohibited payment or gift.
- ✓ You never use personal funds or money from third parties to circumvent the requirements of our policy or the law.
- ✓ We remember that we can be held liable for the actions of third parties who work on our behalf.
- ✓ We clearly record all payments and transactions in the Company's books and records and never make false or artificial entries for any reason.
- ✓ You do not make facilitation payments unless your health, safety or welfare is at stake or unless you have the prior written approval from the law department.
- ✓ We conduct due diligence when hiring or managing third party intermediaries such as sales agents. Contact the law department for assistance with this process.

Nearly every country in which we do business has adopted anti-bribery or anti-corruption laws. We must abide by all such laws. These laws include the U.S. Foreign Corrupt Practices Act ("FCPA"), the United Kingdom's Bribery Act ("UKBA"), the Anti-Unfair Competition Law and the Criminal Law of the People's Republic of China and Brazil's Anti-Corruption Law. These laws apply to all Timken associates, third parties, business units and subsidiaries around the world, regardless of where you live or work.

You are prohibited from paying, providing or offering anything of value that may influence, or appear to influence, the judgment or actions of another. You also must avoid even the appearance of improper conduct, regardless of local practice or the practices of other companies.

ADDITIONAL RESOURCES:

- [Anti-Bribery and Anti-Corruption Policy](#)
- [Engagement of Third Party Intermediaries: Due Diligence Requirement](#)
- [Ethics Reporting Resources](#)

To comply with anti-bribery laws and our policies, you should never offer, promise, accept or pay, directly or indirectly, any form of gift, entertainment or anything of value to:

- Obtain or retain business
- Influence business decisions
- Secure an unfair advantage

FACILITATION PAYMENT DEFINED

Facilitation payments are small sums of money or gifts, made to facilitate the performance of a routine, non-discretionary governmental action, such as processing an application for a permit, license or other official document. Most countries prohibit facilitating payments (for example, there is no exception for such payments under the U.K.

Bribery Act) and Timken rarely allows for them. If you encounter a situation where a facilitating payment is sought, you must obtain prior approval from the law department before making the payment. The only exception to this policy is where the health or safety of a person is at risk. In this case, no prior approval is required and the payment should be reported to the law department as quickly as possible.

.....

Giving or accepting bribes, inappropriate, lavish or repeated gifts or other benefits is always prohibited, even if acceptable according to local customary practices.

.....

GIFTS AND ENTERTAINMENT MUST:

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

GIVING AND RECEIVING GIFTS AND ENTERTAINMENT

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

✓ USUALLY ALLOWABLE:

- Normal sales promotion items branded with the Company name
- Occasional meals
- Non-cash items of nominal value
- Perishable items (e.g. gift baskets, holiday cookies) shared among associates
- Tickets to events that are generally available to the public

✗ NOT ALLOWABLE:

- Cash or cash equivalents such as gift cards, loans or stock
- Luxury items of excessive value (e.g. sporting equipment, designer brands)
- Lavish or extended trips or outings
- Any gifts or entertainment activities that would embarrass you or the Company if they were publicly disclosed

.....

ADDITIONAL RESOURCES:

- [Gift and Entertainment Policy](#)
- [Law Department](#)
- [Ethics Reporting Resources](#)

OUR GIFT AND ENTERTAINMENT POLICIES REQUIRE THAT:

- ✓ You never exchange gifts or entertainment to obtain any improper business advantage.
- ✓ You avoid even the appearance of impropriety when exchanging business courtesies with third parties.
- ✓ You never accept cash, cash equivalents, or gifts of securities from anyone with whom you have a business relationship.
- ✓ You never request or solicit gifts or services, or request contributions from customers, suppliers or other business partners for yourself or for Timken, with the exception of charitable organizations the Company supports.
- ✓ You never use Company credit cards or other Company accounts to purchase personal gifts or entertainment.
- ✓ You ensure that if you offer a gift or to host entertainment that it does not violate the law, customary business practices, or the code of conduct of the receiving party.
- ✓ You return, as tactfully as possible, any gift that does not align with our code of conduct, or if not possible, report it to your supervisor or manager, as well as the law department for help.
- ✓ You keep in mind how your attendance at business entertainment events may be viewed by outside parties.

GLOBAL TRADE REGULATIONS

We deliver our products and services to countries throughout the world. As a result, our activities are governed by international trade laws. These laws, including export laws and regulations, are established country by country and are similar in many ways due to several international organizations and treaties. It is important that you know and follow such laws in all of your international business activities.

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

ADDITIONAL RESOURCES:

- Trade Compliance Department
- Import and Export Policies
- Global Trade and Compliance Intranet Site on TimkeNet
- Ethics Reporting Resources



OUR IMPORT AND EXPORT POLICIES REQUIRE THAT:

- ✓ We deliver our products and services in compliance with international trade laws.
- ✓ You use our enterprise resource planning (ERP) system for business transactions.
- ✓ We conduct “arm’s length” business transactions where the parties act independently.
- ✓ We screen our international transactions to ensure we see no evidence of any prohibited end-destination, end-user, or end-use and watch for warning signs that suggest another party may be trying to evade applicable laws.
- ✓ You understand that we cannot directly or indirectly conduct business with U.S.-sanctioned countries (currently including Iran, Cuba, Syria, North Korea and Sudan).
- ✓ We avoid providing military products or services to countries under an arms embargo by the U.S. government.
- ✓ You remain alert to “prohibited parties” lists maintained by the Company that show us with whom we cannot conduct business.
- ✓ We ensure that our documentation is accurate, complete and transparent.
- ✓ You report any request to participate in restrictive trade practices including prohibited boycotts.

BOYCOTT DEFINED

A “boycott” occurs when one person, group or country refuses to do business with certain people or countries. If you receive, or think you may have received, a boycott request, notify the law department immediately.



CONCLUSION

ADDITIONAL INFORMATION AND RESOURCES

For more information on topics related to ethics and compliance, visit the *Turning Ethics into Action* website from the TimkeNET home page (from the QuickLinks listing, follow the Ethics & Compliance link).

COMPLIANCE WITH OUR CODE OF CONDUCT, THE STANDARDS OF BUSINESS ETHICS POLICY

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

Violations of any Company policy or the law may carry serious consequences. These include disciplinary action, up to and including termination, and possible civil or criminal liability. Our Company retains the right to administer disciplinary action in response to acts of misconduct. All Timken officers and managers are responsible for the enforcement of this policy, and for ensuring associates' knowledge of and compliance with its guidelines. All Timken associates, directors and agents have the responsibility to fully comply with this policy. We also expect everyone working on our Company's behalf to adhere to our ethical standards, including consultants, agents, suppliers and business partners. Our general counsel holds ultimate responsibility for the interpretation of this policy.

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

APPLYING FOR WAIVERS

If you feel a waiver of this policy is necessary or appropriate, including in the event of any potential or actual conflict of interest, you may submit a request for a waiver and the reasons for the request to the general counsel.

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

FUTURE OR ONGOING AMENDMENTS

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

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

TIMKEN HELPLINE TELEPHONE NUMBERS

TIMKEN HELPLINE TELEPHONE NUMBERS

The Timken Helpline is available online and via telephone to report concerns or questions. The Helpline is answered by an external third party, and all reports will be kept confidential to the maximum extent possible.

ETHICS AND COMPLIANCE OFFICE CONTACTS

The ethics and compliance office is a valuable resource for ethics and compliance training, assistance with resolving ethics issues, and reporting incidents. Please email ethics@timken.com or call **+1 (234) 262-7215** for guidance or to report a problem.

PLEASE NOTE:

If you are not able to reach the Timken Helpline using the primary phone number(s) listed for your location, dial 1-800-846-5363.

ARGENTINA

Dial 0-800-555-4288, then pause.
At the prompt, dial 800-846-5363
Dial 0-800-288-5288, then pause.
At the prompt, dial 800-846-5363
Dial 0-800-222-1288, then pause.
At the prompt, dial 800-846-5363

AUSTRALIA

1-800-881-011-800-846-5363
1-800-551-155-800-846-5363

BRAZIL

0800-891-3808

CANADA

1-800-846-5363

CHINA

Northern: 10-800-711-0640
Southern: 10-800-110-0584

CZECH REPUBLIC

00-800-222-55288-800-846-5363

FRANCE

0800-90-5354

GERMANY

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

HONG KONG

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

HUNGARY

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

INDIA

Dial 000-117, then pause. At the prompt, dial 800-846-5363

INDONESIA

001-801-10-800-846-5363

Note: Must call from public phones allowing international access. Not accessible from cellular phones.

ITALY

800-172-444-800-846-5363

JAPAN

KDDI: 00-539-111-800-846-5363
NTT: 0034-811-001-800-846-5363
Softbank Telecom: 00-663-5111-800-846-5363

KOREA

Dacom: 00-309-11-800-846-5363
ONSE: 00-369-11-800-846-5363
Korea Telecom: 00-729-11-800-846-5363
South Korea: 00798-14-800-6599 (It may take up to three minutes to get an interpreter on the line so please do not hang up.)
South Korea: 00308-110-480
South Korea: 00798-1-1-009-8084

LUXEMBOURG

800-201-11-800-846-5363

MALAYSIA

1-800-80-0011-800-846-5363

MEXICO

01-800-288-2872-800-846-5363
001-800-462-4240-800-846-5363
Spanish Operator: 001-800-658-5454-800-846-5363
Por cobrar: 01-800-112-2020-800-846-5363

POLAND

0-0-800-111-1633

ROMANIA

Rom telecom: 0808-03-4288-800-846-5363

RUSSIA

In Moscow
363-2400-800-846-5363 (If you receive a busy signal, please use corresponding numbers for Outside Moscow.)
Outside Moscow
8^495-363-2400-800-846-5363

In St. Petersburg
363-2400-800-846-5363 (If you receive a busy signal, please use corresponding numbers for Outside St. Petersburg)
Outside St. Petersburg
8^812-363-2400-800-846-5363
Elsewhere
8^10-800-110-1011-800-846-5363

SINGAPORE

StarHub: 800-001-0001-800-846-5363
SingTel: 800-011-1111-800-846-5363

SOUTH AFRICA

0-800-99-0123-800-846-5363

SPAIN

900-99-0011-800-846-5363

TAIWAN

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

THAILAND

001-999-111-11-800-846-5363
1-800-0001-33-800-846-5363

TURKEY

0811-288-0001-800-846-5363

UNITED ARAB EMIRATES

8000-555-66-800-846-5363
8000-021-800-846-5363

UNITED KINGDOM

0-808-234-6354

UNITED STATES

1-800-846-5363

VIETNAM

1-201-0288-800-846-5363
1-288-0288-800-846-5363

WEBSITE:

www.timkenhelpline.com



TIMKEN