

### **Forced Labor and Human Trafficking Statement**

The Timken Company is committed to safeguarding against forced labor and human trafficking in our supply chain. This statement is made by The Timken Company pursuant to the California Transparency in Supply Chains Act of 2010, and by Timken UK Limited to the extent it is subject to the UK Modern Slavery Act of 2015.

## 1. Risk Assessment/Verification

The Company conducts a risk assessment audit as part of its due diligence when choosing potential suppliers. Many factors are considered as part of the process, including risks of human trafficking and slavery. All new direct material suppliers are subject to a stringent on-boarding process that is compliant with International Automotive Task Force (IATF) standards. This includes on-site visits ensuring systems and processes are in place covering areas such as quality, capacity, risk management and corporate social responsibility topics. Company personnel and management are experienced in conducting the risk assessment, and accordingly the Company does not employ a third party to conduct the risk assessment.

## 2. Auditing

The Company does not believe the risk of forced labor or human trafficking in its supply chain is significant. The IATF certification also outlines continual compliance audits required based on risk assessments of the supplier. As part of any quality audits conducted on-site at suppliers' facilities by the Company, the Company does require the auditor to watch for and confirm that there are no red flags that could indicate a concern with regards to forced labor or human trafficking. We do not condone or permit human trafficking, the use of child, forced, indentured or involuntary labor in any of our operations or our suppliers' operations.

#### 3. Certification

The Company's Supplier Code of Conduct is widely distributed to its supply base around the world and published on its internet site in multiple languages, and addresses issues of particular importance in our global supply chain, including the subject of labor abuse and human trafficking. The Code requires that suppliers must not use any involuntary or forced labor, and shall comply with all child labor laws. The Supplier Code of Conduct is referenced in our standard terms and conditions that are included in every purchase order issued.

The Company expects our suppliers around the world to adhere to this Code. The Company reserves the right to access suppliers' facilities and records to verify that suppliers are in compliance with the Code. Although certification of compliance to the Supplier Code of Conduct is not required by all suppliers, in the event of a failure of a supplier to adhere to the Code, the Company will impose requirements for prompt implementation of a corrective action plan, or other additional consequences, up to and including the termination of their relationship with the Company.



## 4. Internal Accountability

The Company requires all salaried employees around the world, including those involved in the supply chain, to sign and adhere to the Company's Standards of Business Ethics. The Standards of Business Ethics is available in multiple languages, and outlines the workplace standards and business practices that are consistent with our core values of ethics and integrity and addresses, among other things, compliance with laws regarding human trafficking and forced and child labor.

The Standards make clear that any violations of the Company policy can result in disciplinary action, up to and including discharge. Employees are encouraged to report any concerns regarding business ethics, including human rights concerns, to the Company through our ethics reporting resources, including our Ethics and Compliance Office and the Timken Helpline (via toll-free local telephone numbers or online), and such reports will be investigated thoroughly.

# 5. Procurement Training

The Company provides periodic training to its employees responsible for procurement on a number of topics, including forced labor. Future training will include human trafficking and slavery issues and the mitigation of such risks in its supply chains.

September 10, 2019

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