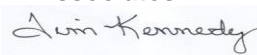


Standards of Professional Conduct Company Policy

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Effective: 3/1/2021
Supersedes: All prior dated location policies

Locations: All Locations
Coverage: All Associates

Approved by:



Purpose

Mannington operates according to a specific Standards of Professional Conduct which outlines the legal, ethical and professional business conduct expected of every associate, officer and director of our company. These standards build upon Mannington's core values, and is designed to protect Mannington's reputation and integrity by establishing standards of professional conduct related to:

- Company Values
- Conflicts of interest
- Related Party Transactions
- Kickbacks
- Confidentiality
- Fraud
- Financial Impropriety
- Any other inappropriate activity

Policy

- Mannington expects associates to conform to and not violate standards of professional conduct as establish within this policy.
- Associates must disclose to Human Resources any known or suspected violations of this policy
- While this policy addresses a broad range of issues, it naturally cannot address every possible instance that might arise. Associates must apply basic common sense and a desire to do the right thing in his/her professional behavior. When in doubt about this policy or the appropriateness of any business action, associates should contact their manager, Human Resources manager or the General Counsel for guidance before taking action.

What are Mannington's Core Values?

Mannington desires to conduct its business in a manner that supports our core values:

- Care
- Do the Right Thing
- Work Hard-Play Hard
- Control Our Own Destiny

What is a Conflict of Interest?

A conflict of interest exists when an associate's personal interests are inconsistent with those of Mannington and create conflicting loyalties. As such, Mannington associates must avoid situations where their personal interests conflict or reasonably could be expected to conflict with the interests of Mannington, including but not limited to decisions that may result in personal gain for an associate or for a relative.

When is a Conflict of Interest a Violation?

Examples of violations of standards of professional conduct include, but are not limited to:

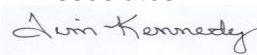
- An associate makes a decision or recommends a decision without disclosing his/her conflict of interest.
- An associate works for another employer in the same or similar line of business or research as Mannington
- Participates in any activity that may be considered to be in competition with, or in conflict with the best interest of Mannington while working for another employer
- Intentionally withholding or delaying the production of information requested and required by Mannington in order for Mannington to protect its legal interests, rights and remedies

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Associates and Contractors that are related

In order to avoid conflicts of interest:

- Any associate related to a contractor being considered by Mannington must immediately notify Human Resources
- Contractors who are related by blood or marriage to any associate cannot be hired without officer-level approval

Associates working for other employers

Associates are expected to render their best efforts to Mannington. In order to avoid conflicts of interest, an associate may not engage in:

- The same or a similar line of business or research as Mannington
- Any employment activity with a customer or supplier of Mannington
- Any activity that may be considered to be in competition, or in conflict with the best interests of Mannington
- Any activity that takes place during an associate's scheduled work shift or normal business hours.

What is a Related Party Transaction?

When an associate or their immediate family member or friend has a significant financial interest in another company that does business or is attempting to do business with or in competition with Mannington. Examples include, but are not limited to, an associate or immediate family member or friend that:

- Has partial or full control of the other company
- Is a member of management of the other company
- Is a board member of the other company
- Is a significant stockholder of the other company
- Is employed by the other company

Other Related Party Transactions

In order to avoid related party transactions, financial interests held by immediate family members in such companies are to be disclosed to Mannington so that a determination can be made as to whether a conflict exists.

When is a Related Party Transaction a violation?

A violation of standards of professional conduct occurs when an associate engages in a related party transaction without prior disclosure to and approval by Mannington of the related party relationship.

What is a kickback?

Associates are not allowed to offer, give, solicit or receive any form of bribe, kickback, payment or other consideration from outside vendors or third parties **for the purpose of securing or appearing to secure preferential treatment for an associate or other intended beneficiary**. This prohibition extends to any transaction that could be considered a bribe or kickback, even if it is not called a bribe or kickback or if it is paid to an intermediary.

When is a kickback a violation?

Every time an associate accepts a kickback

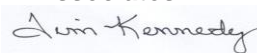
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What is Confidential Information

Confidential information is all information and data, whether prepared by Associate or others:

| Pertaining to..... | Or Entrusted to the Company but belonging to... |
|--------------------|---|
| The Company | Associates |
| Associates | Officers |
| Officers | Suppliers |
| Suppliers | Customers |
| Customers | |
| Affiliates | |
| Business | |
| Operations | |
| Products | |
| Research | |
| Planning | |
| Assets | |
| Properties | |

What are some examples of confidential information?

Confidential information includes, but is not limited to the following (whether marked as confidential or not):

- Trade secrets
- Financial information
- Associate addresses
- Program listings
- Magnetic media
- Codes
- Manuals
- Designs
- Schematics
- Work papers
- Contracts
- Memoranda
- Customer lists
- Price lists
- Correspondence
- Any other company information that is generally accepted as or could reasonably be construed as being confidential in nature.

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What use of confidential information is a violation?

An associate violates the confidential information standard by:

- Using or allowing others to use confidential information except as intended by Mannington
- Directly or indirectly communicating, disclosing, publishing or otherwise disseminating any Confidential Information to any person or corporation without the prior written authorization of Mannington.
- Copying, duplicating or otherwise reproducing, or allowing others to copy, duplicate or otherwise reproduce, any Confidential Information.
- Removing confidential information from their work location without the prior written permission of Mannington.
- Not delivering to Mannington all copies of the Confidential Information within his/her possession or control immediately after termination, terminated associates must certify to the Company, in writing, that all such items have been returned to the Company

What is fraud or Financial Impropriety?

When an associate participates in the intentional, false representation or concealment of material fact for the purpose of harm to another individual or group, or for personal benefit.

When is fraud / financial impropriety a violation?

Whenever an associate commits fraud:

- That violates a law
- Against the company
- Against any other individual or group as a company representative or with apparent authority

Acceptable Practices

- Gifts, meals, or invitations extended by a customer or supplier to participate in any program or activity, such as a party or football game, are acceptable as part of normal business practice if they are not tied to any preferential treatment.
- The holding of insignificant amounts of shares of stock in publicly traded companies who may be suppliers does not constitute a conflict.

Reporting Violations of the Policy

It is the responsibility of every associate to contact Human Resources if he/she observes or is aware of any violation of this policy

Violations

Violation of this policy will require immediate disciplinary action up to and including dismissal in Mannington's sole discretion.

Interpretation

Mannington reserves the right to change, amend or terminate this policy at any time for any reason. Questions regarding the application of this policy should be directed to the Human Resources Department.

The employment relationship between Mannington and its associates is employment-at-will. Any associate is free to end his or her employment with Mannington at any time, for any reason, with or without notice. Likewise, Mannington may, at any time, decide to end an associate's employment with or without cause or prior notice. This policy is not an express or implied contract of employment, and nothing contained in this policy, or in collection with any other policies, creates, or is intended to create, a promise or representation of continued employment.



Company Policy Addendum

Standards of Professional Conduct Summary

Effective: 3/1/2021

Subject: Standards of Professional Conduct-Summary

All associates must abide by the Standards of Professional Conduct, as more specifically outlined in the policy "Standards of Professional Conduct". Below is a summary which while part of the policy is not intended to override or alter any of the contents set forth herein.

| Type of Conduct | Description | Violations |
|-------------------------------|---|--|
| Core Values | <ul style="list-style-type: none">CareDo the Right ThingWork Hard-Play HardControl Our Own Destiny | Acting in a manner that does not support Mannington's Core Values |
| Conflict of Interest | An associate can influence a decision by Mannington that may result in personal gain for an associate or for a relative | <ul style="list-style-type: none">Making or recommending a decision without disclosing a conflict of interest.Working for another employer in the same or similar line of business or research as ManningtonParticipating in an activity that may be considered to be in competition with, or in conflict with the best interest of Mannington while working for another employer |
| Related Party Transaction | An associate or their immediate family member or friend has a significant financial interest in another company that does business, or is attempting to do business with Mannington | Making a decision or recommending a decision without disclosing a related party relationship |
| Kickback | An associate receives any type payment from outside vendors for the purpose of securing or appearing to secure preferential treatment | Accepting a kickback |
| Fraud / Financial Impropriety | An associate participates in the intentional, false representation or concealment of material fact for the purpose of harm to another individual or group, or for personal benefit. | <ul style="list-style-type: none">Committing fraud that violates a lawCommitting fraud against ManningtonCommitting fraud against any individual or group as a company representativeKnowingly misrepresenting financial data or business-related information |
| Confidential Information | All information belonging to the company, or entrusted to the company by others | <ul style="list-style-type: none">Using or allowing others to use confidential information except as intended by ManningtonDirectly or indirectly communicating, disclosing, publishing or otherwise disseminating any Confidential Information to any Person without the prior written authorization of Mannington.Copying, duplicating or otherwise reproducing, or allowing others to copy, duplicate or otherwise reproduce, any Confidential Information.Removing confidential information from their work location without the prior written permission of Mannington.Not delivering to Mannington all copies of the Confidential Information within his/her possession or control immediately after termination. Terminated associates must certify to the Company, in writing, that all such items have been returned to the Company |

- I have read and understand the policy, "Standards of Professional Conduct"
- I have disclosed all violations of this policy I am currently aware of to Human Resources
- I will promptly disclose all future violations that I become aware of to Human Resources

Associate Name (Print)_____Associate ID_____

Associate Signature_____Date_____