



**Mannington Mills, Inc.**

## **Supplier Code of Conduct**

**Effective September 01, 2024**

**Last Updated March 25, 2025**

## Introduction

As a socially minded company, Mannington Mills, Inc. ("Mannington") strives to conduct its operations in a legal, ethical, safe, and sustainable manner. As part of our commitment to operating with high ethical business standards and integrity, we partner with businesses that we expect to commit, uphold our high standards, and demonstrate progress in advancing these standards. This Supplier Code of Conduct, including any appendices, (the "Supplier Code") outlines Mannington's requirements and expectations with respect to legal compliance, responsible sourcing, human rights, the environment, health and safety and business ethics, and the development of a diverse and sustainable supply chain.

The Supplier Code is informed by the International Bill of Human Rights, including the Universal Declaration of Human Rights; The ILO Declaration on Fundamental Principles and Rights at Work; the OECD Guidelines for Multinational Enterprises; the International Covenant on Civil and Political Rights; and the International Covenant on Economic, Social, and Cultural Rights. We operate in accordance with our endorsement of the UN Guiding Principles on Business and Human Rights (UNGPs) and our commitment to the Ten Principles of the UN Global Compact and the Sustainable Development Goals.

## 1. Compliance with the Supplier Code of Conduct

### Suppliers

We require all of our third-party suppliers ("Suppliers") that provide goods or services directly to Mannington including, but not limited to, our product, raw materials and packaging Suppliers, contract manufacturers, logistic providers, distributors, licensees, information systems providers, and marketing and advertising agencies, including their parent, subsidiary or affiliate entities (collectively, "Suppliers") to comply with this Supplier Code. The Supplier Code also applies to all Suppliers' workers, including permanent, temporary, directly or indirectly hired contract workers through subcontractors or labor providers, foreign, or migrant workers (collectively, "Workers"). In addition to the requirements set forth in this Supplier Code, we expect our Suppliers to ensure that no abusive or exploitative conditions and practices, or unsafe working conditions, exist at the facilities where they manufacture or from which they source our products or raw materials. Mannington will not tolerate any Supplier that directly or indirectly, through its subcontractors/raw material suppliers, violates the standards set forth in this Supplier Code or the national, federal, state, provincial and local laws/regulations in the markets where they operate; however, where local laws or standards differ from this Supplier Code, the more stringent standards and principles apply.

## **Subcontractors**

Any subcontractor retained by a Supplier shall comply with this Supplier Code, and each Supplier is responsible for ensuring its subcontractor's compliance. A violation of this Supplier Code by a subcontractor shall constitute a violation by the Supplier.

## **2. Legal and regulatory compliance**

### **Trade**

Suppliers must comply with all laws and regulations applicable to the import or export of the Items, including but not limited to the U.S. trade laws and sanctions regulations. Suppliers will not provide controlled technologies, products, or technical data to Mannington, without providing notice of such controls as necessary for Mannington to maintain compliance with applicable laws.

### **Anti-Corruption / Bribery**

Suppliers must comply with all applicable laws relating to bribery, money laundering, corruption and/or sanctions, including, but not limited to, the U.S. Foreign Corrupt Practices Act, Corruption of Foreign Public Officials Act of Canada and the U.K. Bribery Act and Office of Foreign Sanction Control Sanctions List. Suppliers must not directly or indirectly offer or give money or anything of value to any foreign official for the purposes of obtaining or retaining business or to secure an improper advantage. "Foreign officials" include foreign government officials, foreign political parties or their officials, candidates for foreign political office, or foreign organizations and their employees if the foreign organization is owned in whole or in part by a foreign government.

Mannington also prohibits commercial bribery. Suppliers must not directly or indirectly offer or give money or anything of value (for example, gifts, discounts, charitable contributions, travel, excessive meals, or lavish entertainment) to any representative of Mannington or another company to secure an improper advantage.

## **3. Business practices and ethics**

### **Protecting Information**

Suppliers may be given access to confidential information as part of their engagement with Mannington. All information about Mannington that is not public should be considered confidential information. Suppliers must have and maintain security controls in place to adequately protect Mannington's confidential information and must not disclose it without Mannington's prior written consent. This includes Mannington's intellectual property, trademarks, logos, and proprietary work, which may only be used to fulfill contracted services. Suppliers also must not share with anyone at Mannington's the confidential information of any

other company if Supplier is under a contractual or legal obligation not to share that information. Suppliers must also comply with all applicable data privacy and protection laws and regulations concerning the collection, use and protection of personal information when conducting business with Mannington. Suppliers must take appropriate steps to safeguard confidentiality and privacy of personal information pursuant to applicable data privacy laws.

## **Conflicts of Interest**

Suppliers must not take any action or enter into any transactions with Mannington employees or members of their family that could create or give the appearance of a conflict of interest. A Supplier must disclose to Mannington if it has a family or other close personal relationship with any Mannington employee who has influence over the Supplier's engagement with Mannington.

## **Gifts and Entertainment**

Mannington employees are not permitted to solicit gifts, travel, or entertainment from Suppliers, and Suppliers may not provide gifts, travel, or entertainment that have been solicited by Mannington employees. Any gift or entertainment provided by Suppliers to Mannington employees must be legal under local law, given openly, transparently, and infrequently, appropriate under the circumstances, reasonable (not extravagant) in value, and only given to satisfy a reasonable business purpose. Providing Mannington employees with cash or cash equivalents (such as gift cards) is prohibited in all cases. No gift, commission, fee, or payment of any kind may be provided to a Mannington employee if that gift is intended to influence, could influence, or could reasonably appear to influence the employee's decision making.

## **Responsible sourcing of raw materials**

All Suppliers must, without limitation, design specialized due diligence systems to track and monitor human rights and associated environmental risks linked to the extraction, transport, and use of all raw materials. The process shall be informed by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and shall include appropriate risk identification, mitigation, monitoring, remediation, and reporting mechanisms.

# **4. Human rights and fair labor practices**

## **Forced Labor, Slavery, and Human Trafficking**

Mannington does not tolerate forced labor, slavery, or human trafficking in our supply chain. There shall be no use of forced labor, including prison labor, indentured labor, bonded labor, slave labor, or other forms of forced labor. All Workers must have the right to engage in work willingly and have full freedom of movement, without surrendering travel documents and without the payment of fees for their employment. All Workers must be informed of the basic

terms of their employment before leaving their home location and have the right to terminate their employment without penalty. All forms of forced labor, slavery, and human trafficking are prohibited throughout the supply chain.

### **Child Labor**

Mannington does not tolerate child labor in our supply chain. No person shall be employed under the age of 15 (or 14 where the governing law allows) or younger than the age for completing compulsory education, whichever is higher. Persons under the age of 18 shall not be employed in work that is hazardous or likely to jeopardize their health, safety, or morals. Suppliers must implement an appropriate mechanism to verify the age of Workers and comply with all age-related working restrictions as set by local law and adhere to international standards as defined by the ILO regarding age-appropriate work.

### **Harassment or Abuse**

Mannington does not tolerate harassment or abuse in the workplace or in our supply chain. Every Worker shall be treated with respect and dignity. No Worker shall be subject to any physical, sexual, psychological, or verbal harassment or abuse.

### **Worker Health and Safety**

Mannington requires that all Workers be provided with a safe and healthy working environment. Suppliers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring during work, or because of the operation of Supplier's facilities. Suppliers will comply with all governing jurisdiction's laws regarding workplace safety and conditions. Workers should be trained on the appropriate occupational health and safety policies and procedures prior to employment and then on a regular basis in language(s) understood by the Workers. Workers should be provided appropriate personal protective equipment at no cost to Workers and instructed on its appropriate use. Where residential housing is provided for Workers, Suppliers will provide safe, clean, well maintained, and healthy housing in compliance with all applicable safety regulations.

### **Nondiscrimination**

Mannington does not tolerate any form of discrimination in the workplace. We recognize a strength of our workforce is its diversity. Suppliers must operate workplaces free of unequal treatment in employment (including hiring, compensation, advancement, discipline, termination, retirement), discrimination, harassment, victimization, and any other abuse on any grounds, including but not limited to, the basis of race, color, gender, gender identity, marital status, pregnancy, religion, political opinion, national extraction or social origin, ethnic origin, age, disability, sexual orientation or veteran status.

## **Freedom of Association, Right to Organize, and Collective Bargaining**

Mannington respects the rights of Workers to freedom of association and collective bargaining across its operations and supply chain. Suppliers shall recognize and respect the right of Workers to freedom of association, organization, and collective bargaining. Workers shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. Suppliers shall not discipline or discriminate against Workers who peacefully and lawfully associate, organize, or collectively bargain. In cases where freedom of association is restricted by local law, alternative means of freedom of association, worker representation, and bargaining will not be obstructed consistent with local law.

## **Working Hours, Wages and Benefits**

Mannington is committed to upholding applicable laws and collective bargaining agreements regarding working hours, wages, benefits, and paid leave for individuals employed throughout the supply chain. Suppliers shall not require Workers to work more than the regular and overtime hours allowed by the law of the country where the Workers are employed. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours. Suppliers shall allow Workers at least 24 consecutive hours of rest in every seven-day period.

Suppliers should recognize that wages are essential to meeting their Workers' basic needs. While we encourage Suppliers to pay Workers a living wage or living income that is sufficient for Workers to afford a decent standard of living within the jurisdiction where the Supplier operates or engages Workers, they shall at least pay Workers for all work completed and at the minimum wage required by law, the prevailing industry wage, or the wage negotiated in a collective agreement, whichever is higher. Suppliers shall provide any benefits required by law or contract.

## **Overtime**

In addition to compensation for regular hours of work, Workers must be compensated for overtime hours. All overtime work shall be consensual. Suppliers shall not request overtime on a regular basis and shall compensate all overtime work at such a premium rate as legally required or, in countries where there is no legal standard, at industry standards. In no event shall this be at a rate less than the regular hourly rate. Suppliers shall carry out operations in ways that limit overtime to a level that ensures productive humane working conditions. [UNGC Principle 1].



## 5. Environmental protection and compliance

### Environment

Mannington is committed to protecting the environment and reducing our environmental impact across our supply chain. Using a precautionary principle, Suppliers shall develop and maintain environmentally responsible business practices and are responsible for compliance with environmental laws, including operating with relevant environmental permits and licenses, in the country of operation. Suppliers shall support our environmental responsibility efforts through their own operations, continuously improving performance metrics as related to material efficiency, greenhouse gas emissions, energy and water efficiency, and waste reduction. Suppliers shall report progress on these metrics and any environmental law violations to Mannington at least once a year or as requested.

### Greenhouse Gas Emissions (effective January 01, 2026)

Mannington has committed to reducing its greenhouse gas emissions to net zero by 2050. Our scope three emissions are by far our largest emissions, and we expect Suppliers to collaborate with us to reduce our absolute emissions. Mannington is required by business practice and law to report our emissions to various authorities regularly.

Therefore, we ask Suppliers to provide us their greenhouse gas emissions reduction goals and inventories annually. Specifically, we require emissions inventories directly related to the goods and services Mannington procures not company totals.

See [Appendix A](#) for listing of environmental responsibility required or requested information.

### Transparency

Central to our approach is collaboration with our suppliers who share our values and commitment to chemical transparency. While we acknowledge the complexity of global supply chains, this proactive stance enables us to work collectively towards sourcing materials free from identified chemicals of concern, thereby ensuring the integrity of our products, and safeguarding the health of our customers and the environment.

Because Mannington is committed to earning and retaining the trust of our customers, we require understanding the chemical composition of our products at the 100 parts per million (or 0.01%) level. We make this information available to our customers through environmental and health product declarations for each of our products. We expect Suppliers to provide this information for each material or ingredient we purchase. We do respect our Suppliers' right to proprietary information and have provided means by which that can be maintained and still allow us to have confidence in the information we share with the public.



## Chemicals of Concern

As part of our commitment to customer safety, material health, environmental responsibility, and social accountability, Mannington seeks to eliminate chemicals known or suspected to have adverse impacts on human and environmental health.

Mannington has developed a Chemical Managed Substances List (MSL) and accompanying Terms of Use. The MSL serves as a proprietary, comprehensive guide outlining restricted substances integral to our mission of fostering healthier indoor environments and minimizing ecological impact. By proactively addressing chemical hazards, we aim to uphold the highest standards of product integrity and consumer well-being. In alignment with our vision to create sustainable and safe flooring solutions, we recognize the imperative to identify, reduce, and ultimately eliminate chemicals of concern, including those flagged on watch lists for potential hazards. Mannington will utilize the MSL to screen all current and new materials that constitute our products.

We request that all our suppliers screen their materials against our MSL to ensure company compliance with our chemical safety standards. If any listed chemicals are present in purchased merchandise, or in subsequent purchases, we expect the Supplier to notify us in writing and offer a substitution that can be implemented within a mutually agreed upon time.

Through diligent adherence to the MSL and its use, Mannington reaffirms its dedication to advancing sustainable practices, promoting material health, and driving positive change within the flooring industry and beyond.

The MSL workbook may be downloaded [here](#). **This workbook is considered out of date once downloaded**, and only the posted version of the workbook is considered to be current and accurate.

## Biodiversity

Mannington is committed to sourcing our materials to promote biodiversity conservation and protect natural habitats. We will prioritize suppliers who demonstrate responsible sourcing practices, minimizing the negative impact on biodiversity through measures such as avoiding sourcing from protected areas and implementing sustainable harvesting practices.

## 6. Compliance, reporting concerns and enforcement

### Compliance with Laws

All Standards set forth in this Supplier Code are subject to compliance with applicable local law. All Suppliers shall operate in full compliance with the laws of their respective country of manufacture. If any standard set forth in this Supplier Code is, in the Supplier's judgment, deemed to violate an applicable local law, it must advise Mannington promptly in writing.

### Reporting Violations

Suppliers must immediately report to Mannington any violations of this Supplier Code. Suppliers who believe that a Mannington employee, or anyone working on Mannington's behalf, has engaged in illegal or otherwise improper conduct must also immediately report the matter to Mannington.

Concerns should be reported to [corporate.responsibility@mannington.com](mailto:corporate.responsibility@mannington.com).

### **Supplier Code Enforcement**

Mannington values working in partnership with our Suppliers. Our hope for this Supplier Code is to grow mutually beneficial relationships based on the principles and actions expressed. We expect Suppliers to comply with the requirements in the Supplier Code. A Supplier's failure to comply with the requirements of the Supplier Code will result in a material breach of any supplier agreement, and Mannington will evaluate the supplier partnership and choose an acceptable action plan including but not limited to the termination of such agreement or business relationship.

# Appendix A: Supplier Responsibility Profile

**Effective January 01, 2026**

To comply with increasing market pressure for transparency and a growing number of greenhouse gas emissions reporting laws, Mannington must collect information from its suppliers to inventory our own scope three emissions. Our priority is to obtain emissions inventories from raw material and process chemical suppliers and transportation/logistics providers. From our own experience we recognize the effort required to calculate each scope of emissions and will work with suppliers not currently calculating these emissions to do so.

- Greenhouse gas<sup>1</sup> emissions reporting
  - Scope 1 (*2025 data required Q1 2026 and annually thereafter*)
  - Scope 2 (*2025 data required Q1 2026 and annually thereafter*)
  - Scope 3 (*2026 data required Q1 2027 and annually thereafter*)
  - Emissions reduction goals, timelines, and progress (*annually*)

Mannington is committed to elevating and advancing environmental and social responsibility across its value chain. We encourage our supplier partners to adopt policies that reflect such responsibility, and annually we will request information on the following policies:

- Water reduction goals, timelines, and progress
- Energy reduction goals, timelines, and progress
- Waste reduction goals, timelines, and progress
- Company chemical policy
- Company supplier policy or code of conduct
- Company sustainability/responsibility report
- Employee code of conduct or human rights policy

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<sup>1</sup> Greenhouse gases as defined by the U.S. Environmental Protection Agency

## **Versions**

V1.0: September 1, 2024: original publication

V2.0: March 25, 2025: Managed Substances List added to document

