



# Code of Ethics

2021 Edition

FABRICE  
BARTHÉLEMY

*Chairman of  
the Board*



## MESSAGE FROM THE CHAIRMAN OF THE BOARD ABOUT THE CODE OF ETHICS

Tarkett has built its success by making ethics and integrity the cornerstone of its values. Each and every one of us must contribute to the continuity and furtherance of these values.

We must display exemplary behaviour towards all our stakeholders, including customers, suppliers, colleagues and other partners. Our trustworthiness, credibility and reputation are assets that we must unwaveringly promote and protect in our day-to-day actions.

It is hence essential that we understand the terms of the Tarkett Code of Ethics and apply them by acting with integrity at all times. It is our individual and collective responsibility to maintain the highest ethical standards in our business practices, our conduct relating to human rights and the environment, and many other areas covered by the Code.

The Supervisory Board, the Executive Committee and I pay special attention to respecting and promoting the ethical principles you will find in this Code. We therefore rely on the unwavering commitment of each and every one of you to enact and uphold these key values for our group, on a daily basis.

Fabrice Barthélemy

## OUR COMPLIANCE WITH THE LAW

Tarkett must comply with all applicable laws and regulations, particularly in the areas of work, the environment, competition and anti-corruption.

Compliance with applicable laws and regulations is something we view as essential and “non-negotiable” in the way we manage our day-to-day business in every country.

If no law or obligation applies to a given activity, the principles of integrity and impartiality are a *minimum standard* with which we must comply.

## WHO DOES THE CODE OF ETHICS APPLY TO?

Tarkett attaches the utmost importance to the integrity of the company and each of its directors, managers, employees and representatives.

All such directors, managers, employees and representatives, including Tarkett’s agents, contractors and consultants, are responsible for complying with all applicable laws and regulations in every country where Tarkett operates. Likewise, they must be aware of and comply with Tarkett’s Code of Ethics and other policies.

## OUR FUNDAMENTAL VALUES

The company is in a constant state of change. The same is true for its expectations across a range of areas including generational change, demand for greater transparency, the importance of diversity, respect for the environment, etc. Tarkett must therefore play its part as a responsible economic actor, while respecting robust ethical values and compliance standards.

Tarkett therefore undertakes to grow its business in accordance with these values with regard to:

- its customers (by complying with contractual obligations while aiming to exceed their expectations);
- its employees (by committing to respect for individuals, by opposing all forms of discrimination, and by promoting health and safety in the workplace);
- its suppliers and partners (by complying with clear contractual conditions); and
- the community (by respecting local laws and protecting the environment).

Tarkett also undertakes to limit the scale of climate change by respecting the objectives defined by the Paris Agreement.

## HOW DO I USE THE CODE OF ETHICS?

The Code of Ethics is a reference tool that sets out Tarkett’s ethical expectations and standards.

Each chapter includes a summary of the ethical commitment, the context in which it applies, and recommendations on the way that everyone should act. The Code supplements existing policies and procedures but does not replace them.

Although the Code of Ethics is intended to answer many questions about our commitments, it cannot predict all unknown future circumstances.

If in doubt about how best to act, you should ask yourself the following questions:  
*Is my behaviour in accordance with the law or the Code of Ethics? Would I be embarrassed if my behaviour was revealed in the press or on social media? Am I portraying myself and my company in a positive light? What impact could my behaviour have? Is my behaviour free of personal interest?*

## CONFLICTS OF STANDARDS

Some of our activities or some of the countries in which we operate may be subject to principles, practices or laws that are more demanding than those set out in this Code.

In all circumstances, you must comply with the most stringent principle, practice or regulation.

You should treat this Code as a benchmark, or as a minimum requirement that you must always comply with unless it causes you to break the local law.

If this situation occurs, please contact your manager or someone in the Legal Department.

## LET'S TALK ABOUT THE CODE OF ETHICS

If you have any questions about the application and content of this Code of Ethics, you can contact the following people for further information:

- your supervisor;
- your Legal Department;
- your Human Resources Department;
- a member of the Ethics Committee (composed of the Group's Legal, Compliance and Human Resources managers);
- the Internal Audit Department.

Do not hesitate to contact the persons mentioned above. If they cannot answer your questions, they will point you towards somebody who can.

## OUR MAIN REFERENCE DOCUMENTS

Here are the main documents that supplement the provisions of this Code of Ethics:

- [Anti-Corruption Code of Conduct](#)
- Gifts and Invitations Policy
- [Whistleblowing Procedure](#)
- [Competition Policy](#)
- Guide to Participation in Associations
- International Sanctions Policy
- Guide to Surprise Inspections
- [Supplier Code of Conduct](#)
- Stock Market Ethics Charter
- Confidential and Inside Information Policy
- IT Charter
- IT Security Policy
- Expense Claims Procedure
- Business Travel Policy



### WHO CAN BE A WHISTLEBLOWER?

All employees and other stakeholders can use Tarkett's whistleblowing systems.

This whistleblowing system is used to report:

- a crime or offence (e.g. corruption, money laundering, etc.);
- a serious and manifest breach of an international law, regulation or commitment;
- conduct or situations that are contrary to this Code of Ethics;
- a serious threat to the public interest.

The whistleblower must have personally become aware of the facts or behaviours reported, and must be acting in good faith.

### WHERE CAN YOU FIND THE ALERT SYSTEM?

Employees located in the USA or Canada, or who want to report a problem concerning a Tarkett entity or activity in these countries, must use the Ethics Hotline whistleblowing system. This is accessible in English, French and Spanish via the following URL: <https://secure.ethicspoint.com/domain/media/en/gui/44974/index.html>

Employees located in any other country, or who want to report a problem concerning a Tarkett entity or activity in any other country, must use the Compliance Hotline whistleblowing system. This is accessible in 200 languages via the following URL: <https://app.convercent.com/en-us/LandingPage/c339d8a4-0f59-e811-80da-000d3ab0d899>

Both whistleblowing systems can be accessed from the Tarkett intranet page and from the Group's corporate website.

### HOW DO YOU USE THE WHISTLEBLOWING SYSTEM?

The whistleblower is asked to identify themselves. If anonymous alerts are not prohibited by applicable law, whistleblowers may act anonymously.

Only objectively based facts are taken into account. If possible, these should include the dates, positions and names of the persons involved.

The whistleblower may attach documents supporting their alert.

This system ensures the security and confidentiality of the report, the identity of the whistleblower, and all information collected.

Tarkett's representatives will inform the whistleblower that their report has been received within two (2) working days. The representatives will then check that the alert is admissible and inform the whistleblower within a maximum of ten (10) calendar days.

### WHO REVIEWS THE ALERTS?

Tarkett has chosen to appoint three contact persons to ensure that alerts are always monitored, whatever the timeframe. These are the members of the Ethics Committee composed of the Group Human Resources Director, the Group Legal Director and the Head of Compliance.

Alerts are sent to these contact persons exclusively, who carry out a preliminary examination of their admissibility. They can then forward them to other authorized persons responsible for assisting them in the processing and monitoring of alerts.

The contact persons and authorized persons are responsible for checking the accuracy of the information collected and carrying out any investigations. They are aware of the need to ensure the security and confidentiality of the data obtained via the alerts. Both they and Tarkett are bound by an enhanced confidentiality obligation.



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A photograph of a group of people in a professional setting. In the foreground, two people are shaking hands over a table. One person is wearing a black long-sleeved shirt and a black beaded bracelet. The other person is wearing a dark blue long-sleeved shirt. On the table, there are several documents, including a large sheet of paper with a blue bar chart. In the background, other people are visible, including one wearing a yellow sweater. The scene is brightly lit, suggesting a window in the background.

I

*Our commitments  
as a player in an  
ethically demanding  
business environment*

# 1

## FIGHTING CORRUPTION



### WHAT YOU NEED TO KNOW

Corruption is the offer, promise, gift, acceptance or solicitation of an undue advantage, in breach of applicable laws, that seeks to induce or entice a person to act or omit to act in the course of their duties.

As a signatory to the United Nations Global Compact, Tarkett does not tolerate any form of corruption and actively supports all anti-corruption initiatives. Tarkett is committed to conducting all its activities lawfully, with integrity and transparency, and to developing and maintaining internal policies, procedures and controls that are specifically focussed on the prevention and detection of corruption and influence peddling.

To assess the effectiveness of the anti-corruption and prevention programme, plans are in place for control and compliance audits of its performance and deployment.



### WHAT TO DO

- Ensure that any gift, invitation, donation or sponsorship you are about to give or award is not intended to influence an upcoming project for the benefit of Tarkett
- Give preference to gifts of reasonable value, i.e. less than 100 dollars/euros per recipient per year
- Obtain prior approval from a member of the Division Executive Committee for gifts/invitations worth between 100 and 500 dollars/euros, or from the Division President for gifts/invitations worth more than 500 dollars/euros
- Decline any gift in cash or cash equivalents, such as gift certificates or vouchers
- Attend professional events to which you have invited third parties, and only accept professional invitations for which the person who invited you will be present
- Request a detailed invoice (products purchased, services provided, etc.) to justify any payment made by Tarkett
- Log any gifts, invitations, donations and sponsorships made or awarded in the accounting systems, stating their nature, value and transaction date. Prior approval should be obtained from authorized persons
- Only make donations to or arrange sponsorships with legal entities (and only in accordance with the applicable Delegation of Authority)
- Justify the reasons for choosing an intermediary (sales agent or business introducer)
- If you are acting as a lobbyist on behalf of Tarkett, make it clear that this is the case
- Register with lobbying regulators when required to do so
- Respect the decision-making power of public institutions

#### > OTHER TARKETT REFERENCE DOCUMENTS

*Anti-corruption Code of Conduct / Gifts Policy / Accounting Control Procedure*

#### > CONTACTS

Legal Department, Head of Compliance

## PREVENTING AND MANAGING CONFLICTS OF INTEREST



### WHAT TO DO

- Ensure that your relationships or interests cannot under any circumstances compromise your ability to make independent and objective decisions in the best interests of Tarkett
- Declare any actual or potential conflict of interest when you are hired or generally at any time during your employment
- If a conflict of interest arises, notify the Human Resources Department in writing immediately
- Obtain Tarkett's prior approval before acquiring shares in a competitor, supplier or customer
- Hire job applicants only due to their skills and not due to their family or friendship ties
- Refrain from participating in the hiring process of a relative you have recommended, a member of your family, or your spouse's family (up to the third degree of kinship)
- Refrain from taking part in the selection of an intermediary who happens to be a relative, and be transparent about the existence of this connection from the start of the process
- Refrain from taking part in setting up a partnership with a company in which you or a relative have a significant interest



### WHAT YOU NEED TO KNOW

A conflict of interest exists when an employee or one of his or her close relatives can personally benefit from a transaction involving a Tarkett Group company, or when an employee attempts to favour a company or an individual as part of a transaction in which he or she or a close relative has a financial interest.

To avoid the integrity of a Tarkett employee being called into question, any actual or potential conflict of interest must be reported to Tarkett immediately.

All Tarkett employees must complete and sign a conflict of interest declaration at the time of hiring, which will be kept in their personal file.

Likewise, any change in the employee's personal situation in regard to Tarkett that could lead to a conflict of interest must be reported to the Human Resources department immediately.

#### > OTHER TARKETT REFERENCE DOCUMENT

*Declaration of Conflict of Interest*

#### > CONTACTS

Legal Department, Head of Compliance,  
Human Resources Department

# 3

## MAINTAINING HEALTHY AND FAIR COMPETITION



### WHAT TO DO

- Minimize contact with competitors
- If a competitor addresses a subject that would lead to a breach of competition law as part of a professional association, leave the meeting immediately and ensure that your disagreement and departure have been recorded in the minutes
- Grant objective discounts using predetermined, fair and transparent calculation methods
- Use objective means to justify why you chose exclusive distribution as your selling method
- Always be honest about the content of your advertising (product performance, certifications, technical specifications, environmental criteria, etc.)
- Allow our exclusive distributors to respond to inquiries received from outside the assigned territory, if required by local competition laws
- Keep Tarkett's strategic information (e.g. prices, margins, marketing strategies, terms and conditions of purchase and sale, etc.) safe from third-party disclosure
- If in doubt, consult your legal department about the legality of agreements negotiated with customers/suppliers, in particular on prices, related sales and exclusive distribution



### WHAT YOU NEED TO KNOW

Lack of competition is a threat to the proper functioning of the economic system.

Tarkett seeks to outperform its competitors in a spirit of fairness and honesty. Our competitive advantage is based on better performance and never on unethical or illegal practices. Every leader and employee must do their utmost to respect the rights of Tarkett's customers, suppliers and competitors, and act with honesty in their dealings with them.

Competition rules and laws prohibit any prior written or unwritten understanding, agreement, project, arrangement or process between competitors regarding prices, territories, market shares or customers. As a result, Tarkett executives and employees are formally prohibited from entering into such agreements or understandings with Tarkett competitors.

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#### > OTHER TARKETT REFERENCE DOCUMENT

*Competition policy*

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#### > CONTACTS

Legal Department, Head of Compliance

# 4

## COMPLIANCE WITH INTERNATIONAL SANCTIONS PROGRAMS



### WHAT YOU NEED TO KNOW

As an international company, Tarkett buys and sells goods and services from its partners worldwide.

It is therefore essential for Tarkett to comply with all export control regulations and international trade restrictions in the countries in which it operates.

Prior to any import or export of goods or services, Tarkett must ensure that these operations do not violate applicable international sanctions programmes.

Violations of these sanctions programmes can have serious financial (fines), commercial (bans on doing business) and reputational (media coverage of the sanctions programme violation) consequences.



### WHAT TO DO

- Comply with international sanctions programmes and all rules relating to the import and export of goods and services
- Be aware that international sanctions programmes are not just aimed at the purchase of weapons
- Inform the Legal & Compliance Department as soon as possible of any proposed activity involving a sanctioned country, either directly or indirectly (a list of these countries is provided in the International Sanctions Policy)
- Obtain reliable information about our business partners that may have activities in a country under international sanctions, directly or indirectly, and forward it to your Legal Department (company name, address, country of registration, delivery country, turnover, main shareholders, etc.)
- Identify Politically Exposed Persons (such as public officials) among these business partners
- If the partner is resistant, insist that they provide us with the information we need to assess their compliance with international sanctions programmes
- In case of suspected violations, ask your Legal Department to carry out an assessment of the business partners and their beneficial owners to check if they are subject to a sanctions programme
- Conduct investigations on the ground in case of alerts and/or doubts brought to light in assessment reports
- Stop working with individuals and legal entities subject to a sanctions programme and inform your line manager and Legal Department

#### > OTHER TARKETT REFERENCE DOCUMENT

*International Sanctions Policy*

#### > CONTACTS

Legal Department, Head of Compliance

# 5

## COMBATING MONEY LAUNDERING AND TAX EVASION



### WHAT TO DO

- Do not tolerate any system facilitating tax evasion or money laundering
- Pay the taxes and charges required by local laws
- File tax returns transparently and with close attention to detail
- Comply with Tarkett's obligations as a listed company with a registered office in France
- Refuse any transaction settled in cash
- Ensure our business partners have a genuine legal status
- Refuse to work with partners who do not want to disclose the identity of their beneficial owner(s)
- Before making any payment, check whether the bank account Tarkett must pay money into belongs to the same legal entity as the contract was signed with (unless otherwise contractually agreed)
- Before making any payment, check whether the bank account Tarkett must pay money into is located in a tax haven
- Cooperate with internal and external auditors in their anti-money laundering and tax evasion tasks
- Cooperate fully with the tax authorities
- Report any suspicious activity or warning signs of suspicious activity by business partners (money laundering, tax evasion, terrorist financing, etc.)



### WHAT YOU NEED TO KNOW

Tarkett does not use any complex financial arrangements to obtain a tax advantage that runs contrary to the object and purpose of applicable tax law.

Tarkett does not have any legal entities located in the European Union's "tax haven blacklist" countries - i.e. countries that have refused to engage in dialogue with the EU or to remedy their failures of good tax governance.

Tarkett has not signed any tax rulings with the tax authorities in the various countries in which it operates.

#### > OTHER TARKETT REFERENCE DOCUMENT

*Group Accounting Manual*

#### > CONTACTS

Finance Department, Head of Compliance

# 6

## MAINTAINING THE ACCURACY OF MANAGEMENT DOCUMENTS



### WHAT TO DO

- Keep all accounting systems rigorously up to date
- Collect and store accurate information about payments made or received by Tarkett (amount, recipient, reason, currency, date, etc.)
- Ensure that invoices contain all the details necessary for the proper upkeep of Tarkett's accounts
- Ensure that all information required for expense claims has been correctly entered
- Ensure that expense claims do not cover illegal or unauthorized payments
- Record all payments transparently and accurately
- Store all required authorisations in accordance with the rules set out in the Anti-Corruption Code of Conduct (approvals from authorized persons)
- Ensure that management documents and reports relating to operations and financial performance are drawn up in good faith, and that they are an accurate reflection of Tarkett's status
- Report any false or suspicious entries



### WHAT YOU NEED TO KNOW

All assets, liabilities, expenses and other transactions relating to all Tarkett Group companies must be recorded in the books and accounts of these companies and managed faithfully and accurately in accordance with applicable accounting principles, rules and laws. Archiving procedures must be clearly set out and followed.

No secret funds or unregistered assets of the Group's companies or subsidiaries must be created or maintained, for any reason whatsoever.

Documents relating to commercial or financial transactions must be an accurate reflection of these transactions. No payment should be approved or made if all or part of it is intended for purposes other than those described in the related documents. No false or fictitious entries may be made in the books and records of Tarkett or its subsidiaries.

#### > OTHER TARKETT REFERENCE DOCUMENT

*Group Accounting Manual*

#### > CONTACTS

Finance Department, Head of Compliance

## PROTECTING THE RIGHTS OF OUR SHAREHOLDERS AND INVESTORS



### WHAT YOU NEED TO KNOW

Shareholder rights are protected both by law and by the principles set out in the AFEP-MEDEF Code which applies to Tarkett.

We create a relationship of trust by regularly providing honest, relevant, precise and accurate financial and non-financial information to shareholders and stakeholders in the financial and economic community. Only a limited number of named people within Tarkett are authorized to provide information to the financial markets.

The Financial Communication Department deals specifically with investor and analyst relations. The Management team organizes regular meetings (investor days, road shows) to give investors a better understanding of Tarkett's management and strategy.

We comply with current accounting, financial and stock market standards and regulations. We have implemented specific procedures to prevent insider trading (Privileged Information Committee, Stock Market Ethics Charter, blackout period calendar).



### WHAT TO DO

- Keep all information confidential until it is published
- Read the Stock Market Ethics Charter, which you can find on the Tarkett Group website
- Know how to identify inside information (consult your Legal Department if you have any questions)
- Inform your Legal Department of any confidential information relating to Tarkett that may constitute inside information (see the definition in the Confidential and Inside Information Policy)
- If you qualify as an insider, ask your Legal Department to register you on the insider list
- Do not buy or sell Tarkett shares (in a personal capacity) and do not recommend doing so to a third party (family member or other) (i) during blackout periods or (ii) when in possession of inside information, under penalty of civil, administrative or criminal sanctions
- If in doubt, ask your Legal Department if you can buy or sell Tarkett shares

#### > OTHER TARKETT REFERENCE DOCUMENTS

*Stock Market Ethics Charter / Company Articles of Association / Board Internal Rules*

#### > CONTACTS

Financial Communication Department,  
Legal Department

# 8

## WORKING ETHICALLY WITH OUR CUSTOMERS AND SUPPLIERS



### WHAT YOU NEED TO KNOW

At Tarkett, we are committed to serving our customers through our ability to innovate and our long-standing commitment and achievements in sustainable development.

In line with the requirements of the various laws on the prevention and fight against corruption, as well as the recommendations of the French Anti-Corruption Agency, Tarkett has set up a programme to prevent and fight against corruption. This includes planned measures to carry out ethics assessments of our business partners.

Tarkett is also implementing a vigilance plan to identify risks and prevent serious violations of human rights and basic freedoms, personal health and safety, and the environment. This vigilance plan covers the activities of the company, as well as those of our subcontractors and suppliers.

Tarkett has also developed a responsible purchasing programme by involving our suppliers in the selection of healthier materials that have a reduced environmental impact.



### WHAT TO DO

- Carry out selection and bidding processes in a fair and transparent manner
- Ensure that an assessment has been carried out before working with a third party that is deemed "at risk" under the terms of our Third-Party Assessment Policy
- Ensure that our suppliers understand and adhere to our ethical standards by signing our Supplier Code of Conduct
- Ensure that goods and services ordered from third parties comply with the orders and are delivered on time
- Ensure that the services and remuneration of our sales agents are accurately defined
- Pay our suppliers on time
- Protect our partners' confidential information as if it were our own
- Ensure that no abusive terms and conditions are imposed on our business partners
- Ensure that no intermediaries are used to carry out acts contrary to the law in force and/or the principles set out in this Code of Ethics
- Inform your Legal Department if any of our partners may be economically dependent on Tarkett
- Report any partner that presents a risk to our ethical rules being upheld

#### > OTHER TARKETT REFERENCE DOCUMENTS

*Third-Party Assessment Policy, Responsible Purchasing Policy*

#### > CONTACTS

Purchasing Department, Legal Department, Head of Compliance

# 9

## PROTECTING OUR ASSETS



### WHAT TO DO

- Use company property in accordance with Tarkett's policies and procedures
- Submit to all physical access controls in use at the sites
- Report security flaws in the sites and storage areas, or failures to follow access control procedures at our sites (plants and offices)
- Follow security programmes to prevent unauthorized use or theft
- Ensure that IT tools are only accessible to those with the proper authorisation
- Take the necessary steps to protect all your passwords and identification codes to prevent unauthorized access to company IT systems
- More generally, use IT and communication technologies in accordance with the rules set out in the IT Security Policy (Section 1 – Authorized Use)
- Before using any resources or property belonging to third parties, ensure that Tarkett is entitled to do so
- Report any information relating to a possible infringement of our intellectual property rights
- Preserve the confidentiality of our information (see Sheet 10)
- If you should leave Tarkett for any reason (retirement, end of contract, or any other reason) return all documents and data containing confidential information to your Human Resources Department. Do not keep hold of any copies or materials that you may have in your possession



### WHAT YOU NEED TO KNOW

Everyone is responsible for protecting Tarkett's assets.

To avoid waste, abuse, degradation, theft and misappropriation, we must use and maintain these assets with care and respect.

This concerns not only physical assets (i.e. machines and stocks) but also other tangible property (i.e. company cars, furniture, office supplies and IT equipment).

It also applies to intangible assets (i.e. software, patents, trademarks, copyright and know-how).

#### > OTHER TARKETT REFERENCE DOCUMENT

*IT Security Policy*

#### > CONTACTS

IT Department, Legal Department, Human Resources Department

# 10

## MAINTAINING CONFIDENTIALITY



### WHAT TO DO

- Keep the company's strategic information and know-how confidential
- Organize your office so that no important documents are accessible
- Secure your computer to its base
- Use your computer's privacy filter outside of the office
- Keep your login details secret
- Encrypt attachments containing important information
- Keep information likely to have an impact on Tarkett's share price confidential, unless it has been publicly communicated by the Group
- Refrain from disclosing confidential information to other employees who have no reason to be aware of it
- Check that you have the right to communicate any information to anyone outside the company before you do so
- If necessary, only disclose confidential information in private places
- Ask the Legal Department about the need to sign confidentiality agreements
- When you leave Tarkett, return any confidential information to the authorized persons



### WHAT YOU NEED TO KNOW

Tarkett employees must protect all confidential company information from the risk of disclosure or misuse.

Information shall be considered confidential if (1) it is of a non-public nature, (2) it relates to Tarkett, (3) it is known by a limited number of employees and (4) its disclosure could harm Tarkett.

This confidential information can take different forms, including: business and financial status (e.g. Division results), commercial information (prices, discounts, customer or supplier files, requests for proposals, etc.), marketing projects, information covered by a confidentiality or business secrecy agreement, R&D/R&I and industrial technical data, design information (designs, colors, product concepts, etc.), Human Resources information (salaries, staff details). Any employee disclosing confidential information may be held liable under civil and criminal law.

#### > OTHER TARKETT REFERENCE DOCUMENT

*Confidential and Inside Information Policy*

#### > CONTACTS

Legal Department, IT Department



### WHAT YOU NEED TO KNOW

One of Tarkett's most valuable assets is its image and reputation. It is important for Tarkett and its stakeholders to communicate clearly and transparently about its products and the actions that it takes.

It is therefore essential that you take care to use responsible means of communication that must be approved by the Communication Department.

Likewise, social media is becoming increasingly important in today's digital age. Most people use the Internet as the primary source for information about a company or for gathering opinions about its products and services. As Tarkett employees, our various personal social media accounts can be a showcase for our company. How we communicate on social media can impact Tarkett's reputation. This on-line reputation therefore depends on the way that we all conduct ourselves.



### WHAT TO DO

- Use our brands in an appropriate way and report any infringement of our rights by a third party
- Provide clear, transparent and accurate information about the quality and performance of our products
- Promote our products without exaggerating their performance or presenting them in a misleading light
- Facilitate understanding of our commercial offers
- Communicate transparently about our prices
- Use social media wisely
- Avoid confusion or the risk of confusion between your personal ideas and Tarkett's positioning
- Refrain from disparaging our competitors
- Refrain from insulting and/or discriminatory comments
- Make sure that you respect third parties' intellectual property rights before publishing any content
- Refrain from distributing comments, images or videos if Tarkett is facing an incident or crisis
- Have all official Tarkett statements to the media approved by Group/Division Communications and Investor Relations departments, in particular those relating to strategy, results and sustainable development

#### > OTHER TARKETT REFERENCE DOCUMENT

*"Social Media – Good Practices" guide*

#### > CONTACTS

Communication Department, Financial Communication,  
Legal Department



# II

*Our commitments as  
an employer*



## OUR POLICY

- Do not tolerate human rights violations
- Combat child labor
- Combat forced labor (slavery, prisoner labor, debt bondage, etc.)
- Combat undeclared labor and report any undocumented person working at Tarkett to the competent authorities
- Ensure Tarkett provides decent working conditions
- Comply with the minimum wage provisions laid down by local laws. In the absence of local laws, pay employees based on the applicable remuneration policies in the country concerned
- Treat employees fairly and in accordance with local laws and policies
- Assess our partners to ensure they comply with international standards relating to human rights at work
- Raise awareness among our business partners about combating labor violations
- Encourage our partners to identify internally their main risks of human rights violations
- Encourage our business partners to implement monitoring and corrective actions



## WHAT YOU NEED TO KNOW

Tarkett has developed and implemented a vigilance plan to identify risks and prevent serious violations of human rights and basic freedoms.

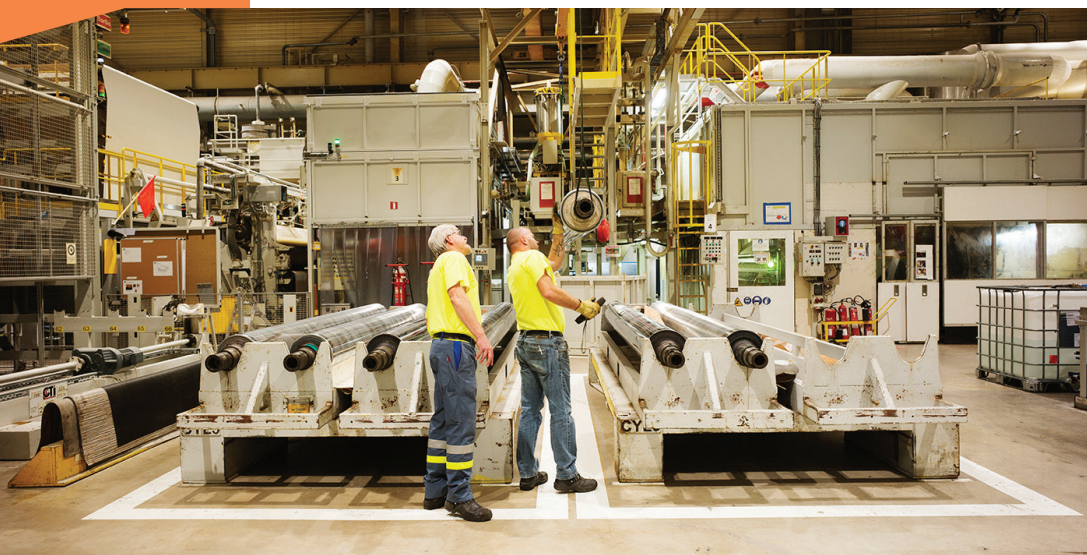
Tarkett does not operate in countries where there is a high risk of child labor. Our internal policies and Code of Ethics nevertheless formally prohibit any form of child labor.

Tarkett is particularly vigilant in detecting abuses that can constitute an infringement of human rights in all their forms.

The Compliance Hotline and the Ethics Hotline allow our employees and business partners around the world to alert us to any potential concerns or violations that they may encounter within Tarkett, particularly in terms of human rights.

## &gt; CONTACTS

Human Resources Department, Legal Department,  
Head of Compliance



## OUR POLICY

- Monitor all safety standards
- Raise awareness of risks linked to equipment, particularly industrial equipment
- Assess risks specific to production lines and all machines
- Make employees responsible for identifying and reporting risk areas that apply to themselves and to their colleagues
- Ensure compliance with safety instructions, particularly those relating to personal protective equipment and clothing regulations
- Ensure that all employees always wear their protective equipment to work, when required to do so
- Refuse to compromise when it comes to safety, health and hygiene
- Encourage open and ongoing dialogue between managers and employees on the subject of risks
- Organize workshops focussed on training, discussion and sharing experiences
- Ban the consumption of alcohol during working hours and ensure compliance with the quantities permitted by law during meals, including with customers
- Ban all illegal drug use on company premises or those of our partners
- Handle all incidents in a way that ensures they do not recur
- Carry out a rigorous analysis of the root causes after every accident
- Carry out frequent audits of our sites' practices (via our safety management audits process – SMAT – in the plants)
- Monitor safety results



## WHAT YOU NEED TO KNOW

Tarkett views safety as a priority commitment beyond regulatory compliance, and sets a goal of zero accidents.

When it comes to safety, there can be no compromise. We all have a responsibility, first and foremost towards ourselves but also towards our colleagues, families and friends.

The commitment of all the teams is paramount, from executives and management to every employee in the company, wherever they are and whatever their job. An action plan aimed at strengthening safety measures and raising all employees' awareness of safety issues has been rolled out across the Group.

Within the plants, the safety pillar of the World Class Manufacturing programme sets out methods, procedures, targets and performance indicators specific to the industrial environment.

## &gt; CONTACTS

Operations Department, WCM Department,  
Human Resources Department



## OUR POLICY

- Spread a culture of equality and respect
- Recruit candidates based solely on their qualifications, experience and skills
- Ensure our employees' progress is based on merit, regardless of their origin, religion, sex, age, sexual orientation, disability, race, etc.
- Promote equal treatment within the company, particularly between men and women
- Reject practices that would result in a specific disadvantage for a category of people
- See diversity as an asset
- Promote diversity in employee profiles and career paths
- Implement suitable measures to develop a more inclusive working environment
- Facilitate the professional integration of those who have difficulty gaining access to employment
- Provide reasonable accommodations within the work environment and certain spaces to allow disabled workers to perform their duties
- Do not tolerate retaliation against those reporting discriminatory practices in good faith



## WHAT YOU NEED TO KNOW

Tarkett's policy is to recruit, hire, train and promote individuals in all types of positions, regardless of ethnicity, color, gender, religion, country of origin, ancestry, place of birth, age, marital status, sexual orientation, disability, veteran status or any other discriminating factor. All employees must base their decisions on this principle, without exception.

Tarkett rewards its employees and demonstrates its recognition in a non-discriminatory manner.

Tarkett promotes concrete actions on the ground to enhance the role of women within the company, in particular through internal mobility and in our external recruitment processes.

Tarkett also works to facilitate the integration of disabled employees into the work environment following local laws and regulations. The same applies to other disadvantaged groups.

## &gt; CONTACTS

Human Resources Department,  
Legal Department

## PROMOTING SOCIAL DIALOGUE



### WHAT YOU NEED TO KNOW

Beyond compliance with local labor laws, Tarkett has the same respect for the basic values and principles of freedom of association in all countries in which it operates. This applies in particular to trade unions.

Tarkett also undertakes to respect its employees' freedom of association, freedom to negotiate, and freedom to bargain collectively. We apply these principles without variation or exception in all countries in which Tarkett operates.

To effectively coordinate an ongoing dialogue with all our employees across all our sites, we regularly conduct internal satisfaction surveys covering all Tarkett divisions and roles, for all employees worldwide. Each site/entity then develops a customized, locally applicable action plan based on the results of these surveys.



### OUR POLICY

- Establish a culture of dialogue that does not distinguish between Group subsidiaries
- Promote regular and respectful communication
- Inform employees about their rights and duties
- Inform employees about the company's development and involve them in this process
- Encourage freedom of expression and opinion
- Set up internal opinion surveys and take their results into consideration
- Encourage open dialogue between employees and managers
- Respect employees' rights to organize under applicable local laws
- Combat any discriminatory behaviour towards employee representatives
- Comply with the collective bargaining agreements in place at Tarkett
- Encourage the search for solutions to avoid any social conflict

### > CONTACTS

Human Resources Department,  
Legal Department

## FOSTERING A RESPECTFUL WORKING ENVIRONMENT



### WHAT YOU NEED TO KNOW

Tarkett's extremely rich work environment is due the diversity of its customers, its professional activities, and its geographical coverage, all of which offer its teams the chance to develop and grow.

We expect our employees to take initiatives and create an environment of trust and accountability in which their talents and personality can be fully expressed, thus contributing directly to Tarkett's success.

Tarkett has a long-term vision. Its employees are invited to integrate CSR and sustainable development into their decisions, operations and activities to design sustainable solutions and business models.

Tarkett is also committed to managing its employees' careers in various proactive ways, such as promoting internal mobility within Tarkett and providing access to a personalized range of skills development measures.



### OUR POLICY

- Encourage teamwork and collaboration
- Ensure that employees can freely express their opinions and concerns, and take these into account in our decisions
- Set clear expectations and ambitious but achievable goals
- Base all managerial decisions on measurable and relevant criteria
- Bring about improvement by sharing both successes and failures
- Promote a working environment that is tailored to employees' individual needs
- Provide the necessary resources for employees to carry out their tasks
- Enable our employees to have growth prospects that motivate them
- Promote internal mobility
- Enable employees to benefit from measures that further their professional development at Tarkett, as long as their request is reasonable and proportionate
- Promote a good work-life balance
- Limit business communications outside working hours to a reasonable level
- Combat all forms of discrimination
- Combat the use of all offensive words and inappropriate gestures

### > CONTACTS

Human Resources Department,  
Legal Department

## COMBATING ALL FORMS OF HARASSMENT



### OUR POLICY

- Do not tolerate any act of harassment either on or outside the company's premises
- Treat all our employees with respect
- Establish a caring work environment that does not tolerate humiliating behaviour
- Ensure that no employee is isolated
- Combat all forms of verbal or physical violence
- Reject any unwanted or inappropriate physical contact
- Prohibit any exchange of pornographic emails, documents and images
- Combat all forms of intimidation likely to create a threatening work environment
- Stop any harassing behaviour towards a person who has expressed their disagreement
- Listen to employees who feel they have not been treated in a professional manner
- Take disciplinary action against anyone whose behaviour constitutes harassment



### WHAT YOU NEED TO KNOW

Each person is responsible for behaving in a way that does not harm the dignity of others.

Psychological and sexual harassment can affect everyone. It can occur both on our premises and in any place where we do business.

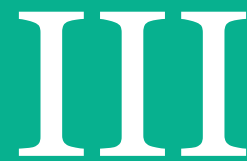
We strive to maintain a fair and harassment-free workplace in all our facilities (including sexual and psychological harassment, in accordance with local laws and regulations).

Tarkett has a zero-tolerance policy for any act that creates a harassing work environment (disciplinary action or even criminal penalties may be initiated should this occur).

To put a stop to any cases of harassment, it is important to be able to alert the Human Resources or Legal departments, either directly or via the whistleblowing systems.

#### > CONTACTS

Human Resources Department,  
Legal Department



*Our commitments as  
a socially responsible,  
accountable and  
solidarity-oriented  
company*



### WHAT YOU NEED TO KNOW

As set out in the “Change to Win” strategic plan, Tarkett aims to make a difference with the circular economy. Tarkett has implemented an eco-innovation strategy inspired by Cradle to Cradle® principles, while contributing to people's sense of well-being and preserving natural capital (resources, climate, water).

We are committed to serving our customers through our ability to innovate and our long-standing commitment and achievements in sustainable development. We believe strongly that changing current models to preserve the planet's limited natural resources and capital is an urgent requirement. Our goal for the coming years is to build a healthy circular economy in our industry. Our environmental policy is mainly focused on respecting the planet's “natural capital” by reducing our environmental footprint, combating climate change, and accelerating the transition to a circular economy based on programmes and economic models that promote the recycling of our products.



### OUR POLICY

Tarkett is committed to sustainable development. It expects its employees to contribute to the implementation of and compliance with its environmental commitments, namely:

- Conducting and ensuring direct and indirect public engagement activities in a manner that respect the goals of the Paris Agreement
- Designing products, services and business models that promote the circular economy
- Developing products and services that contribute to users' well-being (indoor air quality, healthy spaces, comfort, etc.)
- Committing our suppliers to complying with the principles set out in our Supplier Code of Conduct
- Exploring and selecting materials that respect health and the environment, in line with Cradle to Cradle® principles
- Sharing information about our products with our customers while being transparent about their composition
- Promoting an optimized and judicious use of resources at all stages of production, while protecting the environment (water, energy, greenhouse gases, waste and sorting). The same applies to our non-industrial sites
- Developing and promoting our ReStart® programme to collect and recycle our products (after installation and at the end of their lifecycle)
- Everyone must contribute to the achievement of Tarkett's sustainable development goals (Tarkett's Social and Environmental Responsibility Report and the Strategic Plan)

#### > OTHER TARKETT REFERENCE DOCUMENT

*Social and Environmental Responsibility Report*

#### > CONTACTS

Communication/CSR Department, R&D Department,  
Purchasing Department, Legal Department

## RESPECTING LOCAL COMMUNITIES AND CUSTOMS



### OUR POLICY

- Ensure that we carry out our activities in compliance with local laws, in particular with regard to labor law, business law and taxation
- If differences exist between local laws/customs and this Code of Ethics, defer to the provisions imposing the highest standards
- Do not engage in local customs that go against the principles set out in this Code of Ethics
- Engage local communities in regular dialogue and listen to their concerns
- Respect the rights of local communities by limiting the impact of our activity on their lifestyles as much as possible (e.g. noise and olfactory pollution)
- Encourage all employees to volunteer for projects with local communities
- Provide documents that are translated into local languages
- Refuse to denigrate a culture
- Report any inappropriate behaviour by an employee towards a member of a local community



### WHAT YOU NEED TO KNOW

The nature of Tarkett's activities, its development through acquiring local companies and its decentralized structure contribute to the growth of local economic activity.

Tarkett therefore builds relationships with local stakeholders (installers, subcontractors or distributors) while respecting the local culture. In its own distinctive way, Tarkett is Russian in Russia, American in the United States and Chinese in China.

While benefiting from a global presence, Tarkett has always sought to establish its activities locally. Priority is given to the quality and sustainability of its relationships with its customers, with the goal of providing a local service.

We tailor our product offering and its technical features to our customers' local tastes and habits, and to local regulations when necessary.

#### > OTHER TARKETT REFERENCE DOCUMENT

*Social and Environmental Responsibility Report*

#### > CONTACTS

Communications/CSR Department, Human Resources Department,  
Legal Department

## ENSURING THE QUALITY OF OUR PRODUCTS AND SERVICES



### OUR POLICY

- Ensure that our products meet all legal, regulatory and commercial requirements in force
- Ensure that the safety of our products is never compromised
- Take the utmost care when selecting the raw materials used in the composition of our products, in particular by assessing them according to Cradle to Cradle® criteria
- Combat planned obsolescence
- Put rigorous quality control systems in place at each stage of the manufacturing process
- Continuously improve our internal incident detection systems
- Provide transparent, reliable and fair information on the quality and safety of our products
- Promote our products without exaggerating their performance
- Provide a high-quality after-sales service to consumers making complaints
- Encourage the reporting of any incidents that may affect the quality and safety of our products



### WHAT YOU NEED TO KNOW

The success of Tarkett's commercial activities depends on the quality and reliability of its products.

Innovation is one of the pillars of Tarkett's success, ensuring the quality of its products and compliance with regulatory standards, and minimizing the impact of Tarkett's activities on the environment.

The New Product Development Process (NPDP) included in our World Class Manufacturing (WCM) programme has been improved in order to further strengthen its scope and effectiveness, thus facilitating communication and coordination between the different teams involved in the development of a new product (R&D, marketing, CSR, purchasing, operations, etc.).

The choice of quality materials is one of the Group's main pillars. Tarkett is also a pioneer in developing flooring with low emissions of Volatile Organic Compounds (VOCs) in almost all its product ranges.

#### > OTHER TARKETT REFERENCE DOCUMENT

*New Product Development Process*

#### > CONTACTS

Operations Department, R&D Department, WCM Department, Legal Department

## RESPECTING PRIVACY AND PERSONAL DATA



### WHAT YOU NEED TO KNOW

We all have a right to privacy.

"Personal data" means any information that directly or indirectly identifies an individual (for example: a name, an email address, a telephone number, a photograph, a password, an identity document, a social security number, etc.).

Tarkett undertakes to respect and protect the personal data entrusted to it by its employees, customers and business partners.

Our compliance and IT security policies support this commitment by setting out the behaviours expected of our employees and business partners.

As such, Tarkett only collects and stores the data necessary for its activities, after providing the data subjects with clear information about the steps involved.



### OUR POLICY

- Collect only the personal data necessary for the objective in question
- Store personal data for the time necessary to achieve the objective set at the time of its collection
- Delete personal data that we no longer need
- Ensure that personal data are stored securely
- Limit the communication of personal data to those who need to know it
- Inform data subjects about how we collect their personal data. Specifically: (1) what type of information we collect, (2) the reasons for collecting it, (3) the length of time that it is stored, and (4) how to contact us if they have any questions
- Grant individuals whose data Tarkett has collected the right of access and modification
- Obtain the consent of individuals whose photos we collect
- Ensure that the service providers to whom we entrust personal data undertake to comply with high levels of confidentiality and data security
- Consult with the Legal Department before transferring personal data outside the country in which it was collected

#### > OTHER TARKETT REFERENCE DOCUMENTS

*Personal Data Protection Policy*

*HR Personal Data Protection Charter*

#### > CONTACTS

Personal Data Controller, Legal Department,  
Head of Compliance

## DEVELOPING SPONSORSHIP INITIATIVES



### OUR POLICY

- Promote partnerships with local stakeholders having similar values to Tarkett
- Launch sponsorship initiatives for entities involved in ethical, non-political and non-discriminatory operations
- Check that the contribution of Tarkett employees serves the public interest
- Check that sponsorship initiatives are reasonable and appropriate
- Ensure the health and safety of volunteers
- Regularly assess that the partnership is functioning properly
- Declare donations once they are approved
- Log donations in the accounting records
- Check that sponsorship initiatives do not hide inappropriate practices
- Make donations that are wholly altruistic
- Refuse any sponsorship that could create a conflict of interest or that could involve a "quid pro quo" arrangement



### WHAT YOU NEED TO KNOW

The Tarkett Cares programme has formalized the commitment of Tarkett and its employees to local communities in many countries. One of the main aims of this programme is to help improve the lives of people in the communities where we are located, and more generally to contribute to local needs.

Tarkett Cares is a flexible programme that provides this support in various ways, in line with our corporate values and our sustainable development approach.

As part of the Tarkett Cares programme, the company encourages every employee to devote up to two days per year of their working time to an initiative supporting charities or local communities, subject to local agreement.

Tarkett entities may also support local initiatives by donating materials or offering products or finance, and by involving their employees in these projects.

#### > OTHER TARKETT REFERENCE DOCUMENT

*Anti-Corruption Code of Conduct*

#### > CONTACTS

Legal Department, Head of Compliance, Finance Department,  
Internal Audit Department

## PROMOTING A RESPONSIBLE APPROACH



### WHAT YOU NEED TO KNOW

Promoting a collaborative approach is a key value of our Corporate Social Responsibility (CSR) policy. We seek to promote a collaborative approach, both internally and externally, by building partnerships to accelerate the achievement of our goals and by involving key stakeholders such as suppliers, customers and users.

Tarkett has set up a responsible procurement programme to ensure and promote good, positive practices throughout the supply chain. This includes the CSR mapping of purchasing risks, the implementation of the Supplier Code of Conduct, and a supplier assessment/control process.

We also work with our customers by informing them about the environmental features of our products. We provide them with certifications and labels, and encourage them to join our ReStart® flooring collection and recycling programme.



### OUR POLICY

- Select our future partners based on ethical criteria
- Ensure that our suppliers sign our Supplier Code of Conduct
- Carry out a probity check before using a new intermediary
- Ensure that our intermediaries are committed to our values of integrity and probity
- Assess our partners in terms of their respect for human rights, health, safety and the environment
- Support our partners in implementing ethical measures, if necessary
- Provide training for our employees as well as some of our business partners
- Insert a "Global Compact\*" anti-corruption clause into our contracts that allows Tarkett to carry out compliance audits
- Reject any breach of Tarkett's ethical rules by one of our partners
- Take disciplinary action in response to any breach of our Code of Ethics, our Anti-Corruption Code of Conduct and our Supplier Code of Conduct

\* UN principles relating to respect for human rights, international labor standards, the environment and the fight against corruption

#### > OTHER TARKETT REFERENCE DOCUMENT

*Supplier Code of Conduct*

#### > CONTACTS

Legal Department, Head of Compliance,  
Purchasing Department

## IMPLEMENTATION OF THE CODE OF ETHICS

The Code of Ethics is accessible and downloadable on the Tarkett Intranet by any employee. It is also publicly available on the Group's Corporate website.

Each new Tarkett employee is given a copy of the Code of Ethics, and must confirm receipt.

Each employee must read over the content of the Code at their annual performance review, and confirm their commitment to comply with all its rules.

Each Tarkett entity is responsible for translating the Code, implementing its rules, and taking disciplinary measures against any behaviour that violates them.

## COMPLIANCE PROGRAMMES

Certain principles mentioned in this Code of Ethics are developed in more detail as part of compliance programmes.

Tarkett has implemented a programme to prevent and combat corruption by implementing a whistleblowing system, a risk mapping process, a procedure for evaluating its partners, an accounting control procedure, a training plan, a disciplinary action scheme, and an internal control system.

Following the law of 27 March 2017, Tarkett has implemented a vigilance plan aimed at identifying risks and preventing serious violations of human rights and basic freedoms, personal health and safety, and the environment.

A competition policy has also been rolled out throughout the Group. A suitable training programme has been set up to support its dissemination.

## DISCIPLINARY MEASURES

Every employee is required to understand and follow the rules set out in the Code of Ethics.

Any breach of the law, this Code or other Tarkett policies may be subject to disciplinary action.

Sanctions for violations vary and may include disciplinary action up to and including termination of employment, as well as civil or criminal penalties.

Managers' own conduct must be exemplary. They must ensure that their practices are in line with this Code.

Any ethics-related question should be raised with managers or any other authorized person.

## REPORTING VIOLATIONS

You must immediately report any act or omission by another employee that may be in breach of this Code of Ethics.

If you are aware of a possible violation, you may report it to your immediate supervisor, the Human Resources Department, the Legal Department, or a member of the Ethics Committee.

Tarkett has also set up a whistleblowing system that is available to employees, customers, suppliers and business partners. If there is doubt about any behaviour violating the principles set out in this Code of Ethics, alerts can be raised in total confidentiality.

Any type of reprisal against an individual who reports a breach of the Code of Ethics in good faith, or any breach of a law or regulation, even if this report is unfounded, constitutes a serious breach of the Code of Ethics and is strictly prohibited. Acts of reprisal must be reported immediately and will be subject to the appropriate penalties.

