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Code of Ethics

we care / we act

Gerflor®

A few words from Our Chairman

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"Our products have always been present in the daily lives of millions of people around the world, at home, on sports fields, in health facilities, schools, at work, in public places or in transport. We design and manufacture our floor coverings, wall coverings and finishing products while being mindful of our responsibility towards our teams, our customers and our environment, and we set ourselves the highest standards for health and well-being.



As an industrial company that is present in over 100 countries, we pursue our profitable growth objectives while proactively managing our environmental, social and societal impacts.

Nowadays, the Group goes even further and structures its Corporate Social Responsibility approach around a much more global ambition: to have a positive impact on our direct sphere of influence – our employees, our products, our customers and more broadly on society and the environment.

Specifically, this Code of Ethics aims to promote proper conduct whilst fully respecting any ethics, legislation and standards in force and best practices in this field.

It applies to Gerflor employees, including external and temporary members of staff, the entity's co-contractors, as well as their subcontractors, and generally all our partners.

"We care, we act" is more than just a slogan, it is a vision that guides us every day with regards to our teams, our customers, our communities and the planet. »

Bertrand Chammas
Gerflor group's CEO



From the 10 PRINCIPLES of the Global Compact to the 17 Sustainable Development OBJECTIVES of the United Nations

OUR COMMITMENT

We commit to respect and promote the Ten Principles of the United Nations Global Compact which derive from the Universal Declaration of Human Rights, the International Labour Organisation Declaration on fundamental principles and rights at work, the Rio Declaration on the environment and development and the United Nations Convention against Corruption.

Human rights

- Promoting and respecting the protection of international Human Rights Laws
- Ensuring that we are not complicit in violating any Human Rights Laws

International Labour Standards

- Respecting freedom of association and recognising the right to collective bargaining
- Contributing to the elimination of all forms of forced or compulsory labour
- Contributing to effective abolition of child labour
- Contributing to the elimination of discrimination in employment

Environment

- Applying a precautionary approach to environmental issues
- Taking initiatives to promote greater environmental accountability
- Promoting the development and distribution of environmentally friendly technologies

Anti-corruption

- Taking action against corruption in all its forms, including extortion and bribery

OUR CONTRIBUTION

By implementing this Code we contribute to Nos. 3, 5, 7, 8, 9, 11, 12, 13, 15 and 17 of the SDOs.

1 NO POVERTY	2 ZERO HUNGER	3 GOOD HEALTH AND WELL-BEING	4 QUALITY EDUCATION	5 GENDER EQUALITY	6 CLEAN WATER AND SANITATION
7 AFFORDABLE AND CLEAN ENERGY	8 DECENT WORK AND ECONOMIC GROWTH	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	10 REDUCED INEQUALITIES	11 SUSTAINABLE CITIES AND COMMUNITIES	12 RESPONSIBLE CONSUMPTION AND PRODUCTION
13 CLIMATE ACTION	14 LIFE BELOW WATER	15 LIFE ON LAND	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	17 PARTNERSHIPS FOR THE GOALS	SUSTAINABLE DEVELOPMENT GOALS

Our TRACE values

When engaging in their professional activities, Gerflor Group's employees are guided by our core values:

TEAMWORK

RESPECT AND INTEGRITY

ENTREPRENEURIAL AGILITY AND SPIRIT

CUSTOMER SUCCESS

COMMITMENT AND RESPONSIBILITY



Teamwork

We work as a team, celebrate successes and learn from our mistakes.

We grow our teams and help them achieve their goals.

We aim for company success, beyond individual victories.

We communicate openly and proactively.

We support project work and functional organisations.

Respect and Integrity

We conduct our actions with mutual respect, regardless of everyone's role or opinion.

We ensure that our initiatives comply with external and internal standards and rules.

We make sure, in all circumstances, that we act with transparency and honesty.

We support diversity.

We acknowledge and quickly correct our mistakes.

Entrepreneurial agility and spirit

We are inquisitive and open to change.

We rely on effective ideas and actions, which generate tangible results.

We provide pragmatic answers to complex issues.

We are prepared to take controlled risks.

We persevere and are convinced that there is always a way to do even better.

Customer Success

We play a part in mobilising all of the company's resources, by making the end customer and the employee the focus of our attention. For this, we develop HR and managerial practices that promote commitment, collaboration and creativity.

In this way, we support the company's transformation.

Commitment and Responsibility

Gerflor Group's success depends on our ability to attract, mobilise, develop and retain our employees.

We rely on motivated, competent and responsible women and men, acting together with continuous improvement of their performance at the forefront of their thoughts.

By allowing everyone to develop their skills throughout their career, by offering attractive career prospects and by promoting internal mobility, Gerflor recognises commitment, its employees' performance and their contribution to the Group's development.

Human rights

Gerflor undertakes to respect and promote Human Rights and, in particular, those of the Universal Declaration of 10 December 1948 and the United Nations Guiding Principles on Businesses and Human Rights of 16 June 2011.

As they have an international presence, the group particularly wishes to be committed to the causes defended by the Fundamental Conventions of the International Labour Organisation (prohibition of child and forced labour, respect for freedom of association).

> [Human Resources Charter](#)



Social

Health and Safety

Gerflor is committed to complying with Health and Safety regulations and to providing safe and healthy working conditions.

For their part, employees undertake to know and follow all the instructions on health, safety and security and internal regulations. It is also everyone's duty to report any accident, incident or unsafe working condition.

> [Human Resources Charter](#)

> [Health and Safety Charter](#)

Drugs, alcohol & tobacco

Employees are not allowed to consume, possess, sell or be under the influence of alcohol or narcotics in their workplace and during working hours. Similarly, it is strictly forbidden to drive/operate a vehicle, device or machinery while under the influence of drugs that impair a person's attention and vigilance, while drunk or while under the influence of narcotics.

Smoking is also prohibited in the workplace, with the exception of designated areas.

> [Internal regulations of the sites](#)

Discrimination

All our decisions to recruit, hire, develop and promote employees are made without regard to gender, skin colour, ethnic origin, nationality, family status, descent, religious beliefs, union activities, age, disability, state of health, physical appearance, surname

or sexual orientation. These decisions are based solely on the following criteria: competence, experience and professional qualifications. Any discrimination committed by any employee against another will therefore not be tolerated.

> [Human Resources Charter](#)

Harassment

Harassment, in all its forms, is not tolerated at Gerflor. Harassment can take many forms and many are prohibited by law. We are committed to creating an environment in which all employees can work without fear of harassment. It is also your duty to encourage a collaborative environment and not one where an employee is allowed to dominate or abuse the other socially, emotionally, physically or sexually.

> [Human Resources Charter](#)

Listening and Dialogue

Regular communication and dialogue between the managers and their teams is one of the keys to our success. To this end, we encourage responsible social dialogue by facilitating information exchanges within the group.

> [Human Resources Charter](#)

Environment

Given the climate emergency and the shortage of resources, Gerflor is committed to reducing the impacts of its activities, whether direct or indirect.

We also understand our stakeholders' high expectations on environmental protection issues.

So, the Group is establishing sustainable development as a strategic priority that is expressed through 4 main points:

- Assessing our carbon footprint.
- Reducing the impact of our products on the climate and the shortage of natural resources.
- Decarbonising our manufacturing and logistics sites.
- Meeting the recycling challenge.



These main points result in:

- Respecting and going beyond the environmental requirements applicable to our products and factories,
- Eco-designing products (and their packaging) and processes considering their lifecycle,
- Creating recycling facilities,
- Involving our suppliers in achieving the highest environmental standards and in environmental innovation.
- Promptly and effectively raising awareness of and dealing with any incident or accident that may cause harm to the environment,
- Engaging Gerflor employees and partners in the continuous improvement of our environmental and energy performance, through our daily actions, as in all our projects.

> [Environmental Charter](#)

> [Responsible & Ethical Purchasing Charter](#)

Compliance with & adherence to laws and regulations

Compliance is an essential requirement for the Gerflor Group. This results in the establishment of a Compliance Department, tools and procedures at Group level to ensure compliance with international, European, national and local standards applicable to the company. Compliance applies to all Group subsidiaries and activities. Gerflor has set up awareness sessions in the form of mandatory e-learning and training for the employees concerned on compliance with applicable rules.

1. Combatting anti-competitive practices

The Gerflor Group attaches particular importance to compliance with the rules of free competition and complies with all applicable laws, regulations and directives.

Gerflor condemns practices such as:

- agreements between competitors (for example on prices or customer allocation);
- the sharing of sensitive information between competitors (commercial information such as future price increases or current price decreases);
- abuse of a dominant position;
- a boycott that distorts market forces based on the merits of competing companies. It can be organised, without even realising it, in the context, for example, of professional associations.

The Gerflor Group has a Code of Conduct for Competition that can be viewed on the Group's website as well as in the intranet's Ethics tab. This code is also distributed to all Group employees when they join.

> [Code of Conduct for Competition](#)



2. Anti-corruption and influence peddling

The Gerflor Group is extremely vigilant and is committed to fighting, throughout its relationships, against corrupt practices in all the countries where it operates. A programme to prevent and detect corruption has been deployed at group level: corruption risk mapping, anti-corruption code of conduct, training device, whistleblowing mechanism, etc.

The Anti-corruption Code of Conduct can be viewed on the Group's website as well as in the intranet's Ethics tab. This code is also distributed to all Group employees when they join.

> [Anti-corruption Code of Conduct](#)

Corruption and bribery

Gerflor condemns all forms of corruption, whether active (which is done by the briber), or passive (which is done by the bribe-taker), public or private; but the public nature of corruption leads to harsher criminal punishment.

Therefore, all of the group's employees must commit to never offer, get payments authorised for or give an item of value in order to influence a government official, a customer, a supplier, a distributor or a prescriber, to obtain any undue administrative or commercial advantage.

This applies regardless of geographical location or local culture. French injunctions and those of the country in question are cumulative, with the most binding being imposed.

Influence peddling

Influence peddling refers to a person receiving a request for gifts or benefits in kind, in order to abuse their influence, whether genuine or supposed, on a third party, so that they make a favourable decision. Three key players are involved: the beneficiary, the intermediary and the target person with decision-making authority (public authority or administration, magistrate, expert, etc.). This type of practice is also completely forbidden.

Conflicts of interest

A conflict of interest is any situation of interference between the role exercised within the Group and a personal interest, so that such interference influences or appears to influence the independent, impartial and objective exercise of the role within the Group.

The Gerflor Group undertakes to fight against any conflict of interest, whether proven or apparent, which may damage the Group's reputation and trust.

> Personal conflicts of interest

All of the Group's employees must refrain from any potential situations of conflicts of interest, including during political activities. In such a situation, direct or indirect, they must then take the initiative to:

- end any conflicting activity;
- remove themselves from the case concerned;
- and notify their supervisor and/or the Compliance Manager immediately (ethics@gerflor.com).

Facilitation payments

The group opposes the payment of a sum or any benefit to an official (or equivalent) in order to accelerate routine actions of its services. The same applies if these actions aim to speed up or slow down files from the group's suppliers, specifiers, competitors or customers.



> Financial conflicts of interest

In the event of a significant financial conflict of interest (over 1% capital), proven or potential, with a competitor company or a Gerflor partner supplier, the employee must notify their superior and/or the Compliance Manager immediately (ethics@gerflor.com).

All relevant information will have to be forwarded to enable thorough analysis of the situation.

Gifts & invitations

Giving and receiving modest gifts or invitations are part of business life. However, this should not influence us - or give the appearance of unduly influencing us - in our professional decision-making.

Similarly, it is prohibited to attempt to unduly influence a business partner through gifts, invitations or other benefits, regardless of local practices in the countries in which we operate.

What are the rules?

- Gifts or invitations of any kind that can reasonably be considered to unduly influence the recipient or create an obligation on their part may not be offered or accepted.
- However, group members may accept and/or offer gifts or entertainment that are reasonable, infrequent and offered during a professional meeting.
- Certain types of gifts or invitations are prohibited (for example, cash, securities, personal cheques or payments to indirectly related people, indecent, pornographic, racist or offensive entertainment).

Partnerships and sponsorships

Gerflor is honoured to be a partner of many sporting events. However, some precautions must be taken when setting up these partnerships and sponsorships:

- Any payments for amounts of equipment or donations or loans of equipment must be the subject of a specific and full partnership agreement defining the terms and conditions.
- The Group must have full disclosure to the partnership's ultimate beneficiaries to ensure that there is no potential conflict of interest.
- Any partnership or sponsorship (sports or other) can only be initiated after consultation and validation from the Legal Department, the Compliance Department and the Sales Department concerned.



Reliable financial reporting

The Group is committed to transparency and honesty in its financial reporting. Any communication of information that may affect the Group's accounts must therefore be complete, truthful, accurate, timely and understandable. That also means that every employee must be cooperative and honest with internal and external auditors.

- In particular, we expect managers to communicate to their teams that their objectives must always be achieved with integrity and respect for ethics.
- We also expect all employees to inform the Compliance Department or the Treasury Department if they discover any inappropriate payments, invoices or other accounting documents that appear to be misleading.

ETHICS WHISTLEBLOWING MECHANISM

Since adopting our Code of Ethics, the Gerflor Group has made some tools available to you in order to promote the ethics and compliance rules. In view of this and in accordance with legislation, the Gerflor Group has set up a professional Whistleblowing procedure via the Whistleblowing mechanism.

The mechanism enables, via an external email address, guaranteeing confidentiality, even anonymity, Gerflor Group's employees, external and temporary members of staff and any relevant person, to report any information relating to:

- a crime;
- an offence;
- a threat or harm to public interest;
- a violation or an attempt to conceal a violation of an international commitment duly ratified or approved by France, a unilateral act of an international organization made on the basis of such an undertaking, of the European Union law, the law or the regulation;
- an event that is contrary to the Codes of Conduct or this Code of Ethics;
- cases of sexual or moral harassment.

This procedure is available on the Group's website and in the Ethics tab on the intranet. It guarantees protection of the whistleblower's rights and anonymity in good faith.

4. Confidentiality and respect for the protection of personal data

The Gerflor Group undertakes to respect the Group's employees' and business partners' personal data, as well as that of any person for whom it may be required to process personal data.

Personal data that is collected by the Group is processed in accordance with the obligations arising from French regulations and the European General Regulation on the Protection of Personal Data (GDPR).

A Data Protection Officer (DPO) has been designated by the Group and declared as such to the CNIL (Commission nationale de l'informatique et des libertés [National commission for information technology and civil liberties]). They are responsible for the proper application of data protection and implement procedures to ensure this protection. The procedures are available on the Group's intranet in the Ethics tab. The DPO can be contacted by email on: dpo@gerflor.com.

The confidentiality policy can be viewed on the group's website.

3. Complying with international sanctions

When forming new relationships with customers, intermediaries, partners, foreign suppliers, it is imperative to ensure beforehand, with direct managers and the Compliance Department, that these relationships are not prohibited.

Trade restriction measures (embargo) against certain countries (natural or legal persons) or products are sanctions that are implemented by States or international organisations as part of their policy (for example, the United Nations Security Council, or the Common Foreign and Security Policy (CFSP) for the European Union).

They aim to prohibit trade in targeted goods and services (for example: weapons and war equipment, equipment required for exploiting oil, key equipment and technologies from essential economic sectors of the countries concerned, dual-use goods, etc.).

On the other hand, in the event of requests regarding the geographical origin of the Group's products, raw materials or on the products' destination countries, the direct manager or Compliance Department must be approached in order to provide an appropriate response to these requests.

Employees must refrain from disclosing personal data to third parties unless there is a proven legal obligation.

Before sharing any information with third parties or other people outside Gerflor (including their relatives or when using social media), all employees must ensure that they have the right to share this information.

> Social media charter

Group employees are advised not to work or discuss confidential or commercially sensitive information in public places where conversations can be heard and the data's security can become compromised. Similarly, employees are asked to refrain from disclosing such information about a previous job or employer within Gerflor.

> General Data Protection Policy

Ethical business relationships with all our contacts

With our competitors

The Gerflor Group, with its desire to maintain and protect a healthy business ethic, will not tolerate competitor denigration. As with boycotts, denigrations can be direct or indirect (for example through professional associations, contractors, installation companies, etc.). It is therefore different from criticism because it seeks to benefit from a competitive advantage by penalising its competitor.

With our suppliers

The Gerflor Group does not discriminate against any suppliers, regardless of their country of origin, size and condition. In fact, all suppliers must be selected and treated in an objective, fair and transparent manner.

> Responsible and Ethical Purchasing Charter

With our customers

Gerflor Group's main objective is the satisfaction and respect of rights of all customers. Employees must therefore treat all customers honestly and equally, without discrimination. Any refusal to sell to a customer must be duly justified.

With our specifiers

The Gerflor Group interacts with many contacts in its specification work: architects, interior designers, hospital service managers, athletes etc.

The Group's employees must only provide them with genuine, honest, transparent and up-to-date information, without ever providing them with any benefits (in any form whatsoever) that are intended to unduly influence them to order the Group's services and products.

With public officials

The concept of public official is broadly defined as and generally applied to any official or employee of a State, public or international body or of a public undertaking, a local authority, an elected representative, a person exercising judicial authority or a person delegating the powers of one of those persons.

It must always be carefully considered whether the Group's actions can unduly influence a public official wherever he or she is in the world, for example, so that he or she can perform an act that falls within his or her role or favours the Group to the detriment of a competitor.

With our investors

The Gerflor Group is committed, through this Code, to operate in full transparency and in compliance with the business ethics principles with its investors.



WE ARE ALL COMMITTED TO ADHERING TO THE CODE OF ETHICS

If you have any questions related to this code, please send an email to:

ethics@gerflor.com

ABOUT GERFLOR

A market leader with over 80 years of experience with flexible flooring. Gerflor designs, manufactures and delivers innovative, stylish, eco-responsible and easy-maintenance products for covering floors and walls. The Group is present in the tertiary, educational, hospital and sports sectors, but also in private homes for the residential sector. 4,500 employees work in 24 factories and 30 subsidiaries in 100 countries worldwide.

we care / we act

Our commitments to sustainable development by 2025.



-20%
Carbon footprint*



10%
Biobased content



30%
Recycled content



35%
Loose lay**



60,000 T
Annual recycled volume

Gerflor®

* Scopes 1 and 2 defined in the GHG protocol. ** % of work completed with non-adhesive installation products.