

CORPORATE SOCIAL RESPONSIBILITY POLICY

The Corporate Social Responsibility Policy (CSR) is an expression of fundamental values and represents a framework of our existing operating principles. The Polyflor Ltd Board of Directors supports the principles set out in the Policy and the aim is to translate that support into a set of standards and guidelines to provide practical guidance to managers and employees. Each is personally responsible and accountable for compliance of this Policy.

BASIC STANDARDS OF CONDUCT

Employees

We will treat employees fairly and use employment practices based on equal opportunity for all employees. Recruiting, employing and promoting employees on the basis of objective criteria and the qualifications and abilities needed for the job to be performed in line with the Equal Opportunities Policy.

Customers

We will provide high quality and value, competitive prices, and honest transactions to those who use our products. We will deal lawfully and ethically with our customers.

All employees are expected to behave respectfully and honestly in all their dealings with customers and the general public in accordance with the principles set out in this Policy.

Suppliers

We will deal fairly with our suppliers. We will seek long lasting business relationships, without discrimination or deception. In those dealings, we expect those with whom we do business to adhere to business principles consistent with our own.

Communities

We are committed to fostering good relationships with the communities in which we work. We will abide by all national and local laws, and we will strive to improve the wellbeing of communities through the protection of natural resources, through the encouragement of employee participation in charitable affairs.

National and International Trade

We will seek to compete fairly and ethically within the framework of applicable competition. We will comply with all applicable export control laws and sanctions when conducting business around the world.

POLYFLOR LTD STANDARDS OF CONDUCT

The following standards of conduct define our minimum expectations for ethical behaviour.

1. Quality & Safety

Polyflor Ltd is committed to creating and maintaining a safe and healthy working environment for our employees, customers and the community.

Polyflor products are designed, produced and delivered with the primary consideration of the safety and health of our customers, product users, employees and others who may be affected.

2. The Environment

Polyflor Ltd is committed to making continuous improvement in the management of its environmental impact as set out in our Environmental Policy and Objectives.

All employees are expected to adhere to the requirements of the environmental management programme and support the improvement in our environmental performance.

3. Bribery

No Polyflor employee or business working on our behalf must accept or give a bribe, facilitation payment or other improper payment for any reason.

Polyflor Ltd will ensure it complies with the requirements of the Bribery Act 2010.

For further guidance, please refer to the Anti-Corruption Policy.

4. Gifts and Corporate Hospitality

Employees can only accept and keep gifts paid for by third parties if they are nominal in value. Where refusing a gift would cause offence (customary in a particular market), it may be accepted provided it is proportionate, lawful and properly recorded in the Gifts and Hospitality Register held by the HR Department.

For further guidance, please refer to the Anti-Corruption Policy.

5. Conflicts of Interest

Whilst we respect the privacy of our employees, all Polyflor Ltd employees are expected to avoid personal relations, activities and financial interests, which could conflict with their responsibilities to the Company. Polyflor Ltd employees must not seek gain for themselves or others through misuse of their positions or company property.

6. Personal Conduct

All employees are expected to behave in accordance with the principles set out in this Policy.

Employees are expected to protect and not misuse company assets such as buildings, vehicles, equipment and cash.

Employees are expected to use e-mail, internet, IT and telephones in a manner appropriate for business purposes in line with the principles contained in this Policy and any applicable IT policies.

7. Supply Chain

We purchase a wide range of goods and services required in the operation of our business and we also rely on a number of key suppliers for the delivery of our core products. Good working relationships with our suppliers are therefore central to the success of our business.

Whilst we are committed to obtaining and retaining competitive goods and services we will at the same time seek to ensure they are from sources that have not jeopardised human rights, safety or the environment.

We expect our suppliers to adhere to business principles consistent with our own. We expect them to adopt and implement acceptable safety, environmental, product quality, labour, human rights, social and legal standards consistent with our own.

Our suppliers are or intend to be accredited with ISO 14001 .

8. Confidentiality

Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.

9. Equal Employment Opportunity

Polyflor Ltd will treat employees and applicants for employment fairly, based only on factors related to Polyflor Ltd legitimate business interests.

Polyflor Ltd does not use child labour or forced labour.

Polyflor Ltd is dedicated to promoting employee development through assistance in improving and broadening work related skills.

10. Workplace Environment

Polyflor Ltd is committed to providing its employees with a workplace that is free from known safety and health hazards and a work environment free from discrimination, harassment or personal behaviour not conducive to a productive work climate.

All employees will abide by the applicable laws and regulations regarding possession or use of alcohol, drugs and other controlled substances in line with the Substance Misuse Policy.

The Corporate Social Responsibility Policy does not form part of any employee's contract of employment and it may be amended at any time.

Signed

for and on behalf of Polyflor Ltd.