
THIRD PARTY CODE OF CONDUCT

Milliken™

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OUR PURPOSE

Together we strive to positively impact the world around us for generations to come

OUR VISION

Drive shareholder value with an innovative, focused product portfolio, optimized manufacturing footprint, and a modern customer experience with a lean, effective enablement backbone.

OUR VALUES



INTEGRITY

Do the right thing. Tell the truth, keep commitments, and raise concerns early. Avoid hiding mistakes or cutting corners.



EXCELLENCE

Follow safety, quality, and compliance procedures. Avoid shortcuts, even under pressure.



INNOVATION

Improve responsibly and transparently. Raise concerns when new ideas create risk.



SUSTAINABILITY

Consider long-term impacts on people, planet, and our business conduct.



PEOPLE

Treat everyone with dignity and respect. Prevent harassment, discrimination, and retaliation.



CODE OF CONDUCT INTRODUCTION



At Milliken, our purpose is to make a positive impact on the world around us for generations.

In this pursuit, our values of People, Integrity, Excellence, Innovation, and Sustainability guide how we engage with third parties and all those impacted by our business including customers, communities, and the environment.

Our commitment to these values is reflected in our strong third-party relationships, high-quality products, talented and engaged associates, community reputation, and our relentless pursuit of safety and environmental excellence. We believe that our business partners must share this commitment.

Milliken acknowledges and respects the differences in culture and legal requirements throughout our global supply chain. Even so, we require more than strict compliance with all applicable laws — we require goods and services to be produced or performed in an ethically, socially, and environmentally responsible manner.

The Milliken team proudly follows our own internal Code of Conduct. Our associates and directors reconfirm their compliance with our code each year. Similarly, we expect third parties to follow the ethical business principles of this Third Party Code of Conduct (or your own code if similar) and the highest, applicable international standards.

Integrity is critical to all successful long-term businesses and provides the foundation for our strong relationship with you. We look forward to working with you to bring innovative products to market, so that we both may take pride in the value these products bring to our customers and the communities they positively impact.

Michael Brown
Executive Vice President, Milliken Operations

“ Integrity is critical to all successful long-term businesses and provides the foundation for our strong relationships with our business partners.



TO ASK A QUESTION OR RAISE A CONCERN, VISIT
<https://mll.kn/SpeakUp>

GENERAL PRINCIPLES

SCOPE

Any third-party, business, or individual providing goods or services to Milliken & Company, including our global operating subsidiaries, are within scope of these guidelines. The term “third party” is inclusive of suppliers, vendors, consultants, agents, contractors, temporary workers, distributors, dealers, licensees, customers, and business partners. The owners, officers, directors, employees, consultants, affiliates, contractors, and subcontractors of these third parties should adhere to this Third Party Code of Conduct. Charities, NGOs, and social enterprises who receive funding or product donations from Milliken are also included within the scope of this document.

HIGHEST STANDARDS

At Milliken, we make every effort to conduct our business in accordance with the highest legal and ethical standards. We do not condone or tolerate efforts or activities to achieve results through illegal or unethical dealings anywhere in the world.

COMMITMENT AND ACCOUNTABILITY

You agree to follow the requirements in this Third Party Code of Conduct when delivering goods or performing services for Milliken. You should incorporate this Third Party Code of Conduct into policies and procedures for your employees in their native language(s). We expect you to cascade these, or equivalent, requirements to your value chain. You may accomplish this by requiring that your employees and contractors comply with your own code of conduct or with policies similar to this Third Party Code of Conduct. You should encourage compliance with the principles set out herein within your own operations and communicate these expectations across your value chain.

DUTY TO SPEAK UP AND NON-RETALIATION

Milliken expects you to have an effective grievance management system in place for grievances or concerns raised by your workers or by third parties, which elevate potential violations to management in line with the U.N. Guiding Principles. You should report any violations directly to Milliken’s management or online via our third-party managed, anonymous (if allowed by the laws of reporter’s country) Helpline at <https://mll.kn/SpeakUp> or by calling 1-866-327-8419 (international dialing instructions available online). Milliken will not [retaliate](#) against any third party who genuinely reports a violation. Your employees or contractors may also report suspected violations of this Code to [Milliken’s Helpline](#). You must maintain a safe environment for reporting and must not threaten or penalize employees or contractors for speaking up.

RISK MANAGEMENT

You must establish procedures to regularly identify, evaluate, and manage risks in all areas addressed by this Third Party Code of Conduct and with respect to all applicable legal requirements.

BUSINESS CONTINUITY

You must have appropriate business continuity plans in place for your operations that support Milliken’s business.

SUSTAINABLE BUSINESS PRACTICES

Sustainability is one of our core values. Milliken encourages all of our third parties to join us in our sustainability commitment. That includes understanding key social and environmental impacts, risks, and opportunities across your value chain, and then, monitoring social and environmental sustainability metrics, preventing, mitigating, or ending adverse impacts, and reporting regularly on progress. For more information on Milliken’s sustainability practices, refer to our annual [Sustainability Report](#).

TRANSPARENCY AND DISCLOSURE

We encourage you to report externally about your social and environmental impact in line with the principles set forth in this Third Party Code of Conduct.

MANAGEMENT SYSTEMS, MONITORING AND AUDITS

You must put in place and use management systems including policies, training and internal controls for complying with the principles of this Third Party Code of Conduct. We verify alignment with and achievement of our Code requirements, including social and environmental factors, through self-declaration, due diligence scanning, online assessments, and independent verification by third-party auditors, as needed, for high-risk sites. You must maintain reasonable documentation demonstrating compliance with the principles of this Third Party Code of Conduct and allow us (or independent auditors) to audit that documentation and product/service quality and safety upon reasonable request. We may also ask for information about third parties to understand our value chain. If a potential or confirmed nonconformance is identified, you must promptly implement corrective actions, provide evidence of remediation upon request, and cooperate in good faith with any follow-up verification.

Subject to existing contractual obligations, we reserve the right to take all necessary actions to enforce our Third Party Code, including termination of our relationship with any third party who refuses to comply with the principles of this Code. Violations of this Code may also constitute violations of law, which may expose Milliken to criminal or civil liabilities. Milliken may require reimbursement for any costs associated with a violation of this Third Party Code.

PEOPLE AND LABOR

RESPECT AND DIGNITY

You must respect and support internationally recognized human rights. You must treat all employees with respect while fostering a culture of integrity, fairness, and personal accountability. You must not use or allow corporal punishment, threats of violence, sexual abuse or other forms of physical coercion or harassment of your employees.

CHILD LABOR

You must not tolerate child labor. You must avoid any child labor in your operations consistent with the International Labor Organization's core labor standards and the United Nations Global Compact principles. If local minimum age law stipulates a higher age for work or mandatory schooling, the higher age applies. You should take all necessary steps to ensure that you do not employ anyone under the minimum legal age for employment. In no instance shall you permit children to perform work that exposes them to undue physical risks that can harm their physical, mental, or emotional development or improperly interfere with their education or vocational needs. You may use legitimate workplace apprenticeship programs that comply with all laws and regulations applicable to those programs.

FORCED LABOR

All labor must be voluntary. We do not tolerate slavery, servitude, forced or compulsory labor, or human trafficking. Bonded, indentured, or involuntary prison labor is not tolerated or accepted. You must not charge workers recruitment fees. Practices such as withholding personal property, passports, wages, training certificates, work, or any other document for inappropriate reasons are not acceptable. You must comply with all applicable local, national, and international legislation relating to forced labor and continuously monitor developments related to your business area.

ANTI-HARASSMENT

You must maintain a professional and harassment-free working environment. You must act with respect and courtesy towards others. Unwelcome conduct – whether verbal, written, physical, or visual – that is based on a person's protected status such as race, color, religion, gender, age, nationality, disability, sexual orientation, gender identity, military or veteran status, pregnancy, genetic information or any other protected status – will not be tolerated.

NONDISCRIMINATION

Milliken is an equal opportunity employer that makes employment decisions and takes affirmative steps to employ and advance in employment without regard to race, national origin, caste/class, religion, age, color, sex, sexual orientation, gender identity, disability, or protected veteran status, or any other characteristic protected by local, state, or federal/national laws, rules, or regulations. You must abide by the same principles and, if in the U.S., must comply with the Equal Employment Opportunity (EEO) regulations or equivalent legislation outside of the U.S. We expect you to eliminate barriers that could prevent the full participation of some groups, so everyone has access to equitable treatment, opportunities, and advancement.

WAGES AND BENEFITS

You must, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits. We encourage you to periodically review compensation practices against credible living wage benchmarks and reasonable efforts to address gaps, where applicable to your operations.

WORKING CONDITIONS

Working time for your employees must not exceed the maximum set by applicable law and by International Labor Organization standards. You must not exceed prevailing local work hours and will appropriately compensate for overtime. Workers must not be required to work more than 60 hours per week, including overtime, except in extraordinary business circumstances with their consent. In countries where the maximum work week is less, that lower standard will apply. You should provide workers one day of rest every 7 days, except in emergent or unusual situations, and not allow more than 21 consecutive days of work without rest.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

You must respect employees' rights to form and join trade unions or work councils and to bargain collectively in accordance with applicable laws.

GRIEVANCE MECHANISM AND WORKER VOICE

You must provide a method for employees to raise legitimate grievances or concerns, including concerns related to safety, labor practices, harassment, or suspected violations of law or this Code, without fear of retaliation. You should ensure that timely, objective, and thorough investigations are carried out for any compliance concerns, and that appropriate remediation is implemented, including disciplinary measures as may be appropriate.

HEALTH, SAFETY, AND ENVIRONMENT

HEALTH AND SAFETY

You must provide your employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Consistent with these obligations, you should have effective programs and management systems for safety, incident investigation, chemical safety, ergonomics, and similar topics, and provide the same standards of health and safety in any housing you provide for employees. In addition, you shall provide access to safe drinking water, sanitation and hygiene, including adequate restrooms and handwashing facilities; fire exits and essential fire safety equipment; emergency aid kits; and access to emergency response services including environmental, fire and medical.

OCCUPATIONAL HEALTH AND SAFETY

You must implement appropriate controls, safe work practices, adequate maintenance, and technical protective measures to identify and reduce health and safety risks associated with your operations and work activities. You must take reasonable steps to prevent accidents and occupational illnesses and to protect your employees against chemical, biological, physical, and other workplace hazards, where applicable. You must provide your employees with appropriate personal protective equipment when required based on identified risks.

PROCESS SAFETY

You must have appropriate safety programs in place to identify, manage, and control operational risks in accordance with applicable regulatory safety standards. Programs should be proportionate to the nature of your activities and associated risks. Where applicable to your operations, you must regularly conduct risk assessments and take steps to prevent incidents such as chemical releases, fires, explosions, or similar hazardous events.

PRODUCT SAFETY

If you manufacture, supply, or handle products, materials, or hazardous substances, you must comply with product safety regulations, label products correctly, and communicate product-handling requirements. You must provide all necessary safety information for all hazardous substances in your products or processes when there is a legitimate need. This includes product information, safety data sheets, notification or registration confirmations, uses and exposure scenarios.

EMERGENCY PREPAREDNESS

You must make appropriate safety information available to employees and workers and provide training to support effective response and protection. Where applicable to your operations, you must have emergency preparedness measures in place, including fire protection, emergency plans, regular drills, and response procedures designed to minimize and respond to emergency situations.

ENVIRONMENTAL PROTECTION

You must operate in a manner that is protective of the environment. At a minimum, you should comply with all applicable environmental laws, regulations and standards, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits, and environmental reporting. You should also have an environmental management system that includes, as appropriate: metrics to manage environmental impact, measures and controls (including audits), reporting, and training. You must promptly report significant environmental incidents that may affect Milliken products, operations, or reputation, and must cooperate on remediation and prevention. For more information, please review Milliken's [Environmental Policy Statement](#).

ENVIRONMENTAL HEALTH

Any activity that has the potential to adversely impact human or environmental health must be appropriately managed, measured, and controlled. Minimize the release of hazardous substances. Give special attention to active ingredients. You must prevent or mitigate accidental spills and emissions of hazardous materials.

WASTE

You must manage waste and wastewater in a safe, responsible, and legally compliant manner, including appropriate handling, storage, transportation, disposal, recycling, reuse, and discharge, where applicable to your operations.

RESOURCE CONSERVATION

You are expected to use natural resources, such as energy, water, and raw materials, efficiently and to take reasonable steps to preserve them. Where applicable, circular economy principles are encouraged.

CLIMATE PROTECTION

You must encourage the development and use of environmentally and climate-friendly products, processes, and technologies. The policies and practices of our third parties impact our sustainability strategy. Developing and implementing a climate strategy, including an analysis of your impacts, risks, and opportunities is critical. We encourage you to evaluate the potential adverse impacts of climate change on your operations and related financial impacts to your businesses, and to disclose those findings. You should then mitigate these risks and their potential impacts on our business.

We expect you to track your scope 1, scope 2, and scope 3 greenhouse gas emissions and related impacts in accordance with established GHG reporting standards. You are expected to demonstrate continuous improvement in emissions management and reduction efforts and, upon request, provide reasonably available data on annual GHG emissions and product carbon footprints.

BUSINESS CONDUCT

ANTI-CORRUPTION AND BRIBERY

We have a zero-tolerance policy towards any form of corruption, bribery, or any business practices that could create the impression of improper manipulation or influence. This requirement applies irrespective of any apparent regional customs. While conducting business activities, you must prohibit, directly or indirectly, accepting, offering, or granting tangible or intangible benefits (in the form of gifts, invitations, or other gratuities) to or from Milliken, public officials, or third parties.

You must strictly comply with all laws and regulations on bribery, corruption, and prohibited business practices, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, or any other applicable law. You must not offer or provide any bribes, favors, gratuities, gifts, payments, or anything of value directly or indirectly (including through an intermediary) to any governmental or quasi-governmental official or employee, to any political party, official or candidate, or to any other person in an attempt unduly to influence such person's business relationships or in violation of the laws or customs of the territory in which the services are provided.

INTERNATIONAL TRADE CONTROLS

You must comply with applicable export control, import, and economic sanctions laws and regulations. This includes adhering to restrictions on dealings with sanctioned countries, regions, entities, and individuals, and ensuring appropriate screening against applicable restricted party lists. You must provide accurate and truthful information to customs and other authorities when required and disclose country of origin information, if applicable. Ensure that all valuations, classifications, declarations, and documents pertaining to trade and customs matters are accurate, complete, and compliant with applicable laws.

FAIR COMPETITION/ANTI-TRUST

You must conduct business in line with fair competition and in accordance with all applicable anti-trust and competition laws. You must compete fairly and independently in all business dealings, including pricing, bidding, and contracting activities. You must not discuss price-sensitive or other competitively sensitive information with any competitors. Refrain from entering into any agreements that could restrict competition. Obtain information concerning competitors using only ethical means and from publicly available sources.

CONFLICT OF INTEREST

A conflict of interest arises when a corporation's or individual's personal interests interfere with professional obligations and responsibilities. It is essential that you maintain a high level of integrity and avoid any situation that could create a potential, perceived, or actual conflict of interest. Potential conflicts of interest (including family or close personal relationships) involving our employees, a third party, or supply chain partner must be disclosed to your Milliken business representative. We will work together to mitigate any potential harm to the business relationship and ensure confidence in the relationship's integrity.

POLITICAL ACTIVITY AND LOBBYING

You must not make political contributions or provide gifts to any candidate for public office, elected officials, political parties, or committees on behalf of or as a representative of Milliken. You must not represent their political views as those of Milliken or use Milliken resources in connection with their political activity. You must not lobby on behalf of Milliken unless specifically engaged in writing to do so.

LEGAL AND OTHER REQUIREMENTS

You must comply with all applicable laws and regulations where you conduct business, maintain contractual agreements, and with applicable internationally recognized standards. You must also comply with generally accepted industry standards, obtain and maintain all applicable permits, certificates, licenses, and registrations, and operate in accordance with permit limitations and requirements.

BUSINESS CONDUCT

INTELLECTUAL PROPERTY

You must safeguard and use confidential information only as authorized and ensure that the privacy and valid intellectual property rights of Milliken your personnel, and all third parties are protected. You must not use Milliken's name, trademarks (including our affiliates') in any publicity, marketing, or external communications without our prior written consent.

MARKETING AND MEDIA COMMUNICATIONS

Your marketing and communications should convey accurate, truthful information. Milliken has designated spokespersons authorized to communicate with the media. You may only communicate with the media regarding business with Milliken with the express written pre-approval of Milliken. You must not post, share, or like anything that could be viewed as a violation of this Code, including items that are malicious, disparaging, bullying, or that could jeopardize the safety of another individual, including but not limited to Milliken employees or other third parties. Use of Milliken's name or logo in public relations or marketing materials without prior written approval is strictly prohibited.

SUPPLY CHAIN SECURITY

Milliken is a certified member of the Customs-Trade Partnership Against Terrorism (CTPAT) supply chain security initiative of the U.S. Bureau of Customs and Border Protection (CBP). If applicable to your role in Milliken's supply chain, you must maintain supply chain security procedures in accordance with the minimum-security criteria of the CTPAT program. Whether eligible for the CTPAT program or not, you should develop and implement procedures for periodically reviewing and improving your supply chain security in accordance with the CTPAT minimum security criteria, including periodic on-site visits by Milliken's Global Supply Chain Security Team.

CONFLICT MINERAL RULES

If you supply products or materials to Milliken, you must ensure they do not contain metals derived from minerals or their derivatives originating from conflict regions that directly or indirectly influence, finance, or benefit armed groups and cause or foster human rights abuses. You may not incorporate conflict minerals originating in the Democratic Republic of the Congo (DRC) and its adjoining countries that may finance or benefit armed groups in the DRC or an adjoining country in your products. You must provide documentation tracing the origins of any Conflict Minerals used in the manufacture of your products for Milliken. If applicable, you must complete a "Conflict Minerals Free Certification" as requested by Milliken. You must make the same, or similar, requirements of your upstream suppliers, whose components are used in products you supply to Milliken.

INFORMATION SECURITY AND ARTIFICIAL INTELLIGENCE

You must protect the confidentiality of Milliken's confidential business, trade secrets, personal data, and financial information by implementing and maintaining security measures that conform to best practices and meet applicable information security standards, laws, and regulations.

You must not use tools or platforms, including artificial intelligence tools and machine learning models, that could expose our confidential or proprietary data, or personal data provided by or processed on behalf of Milliken (including relating to our employees, customers, suppliers or shareholders), to any third parties without prior written approval and consent.

DATA PROTECTION AND PRIVACY

You must process personal data in compliance with all applicable privacy laws and regulations. You are required to put appropriate organizational and technical measures in place to protect personal data against misuse, damage and loss and you must promptly notify us of any relevant personal data breach with sufficient information to allow us to assess such breach.

In certain cases, we may require you to enter into a separate data processing agreement with us to regulate how you handle personal data. More information on Privacy at Milliken, including copies of our [Privacy Notices](#), is available at www.milliken.com/privacy.

INSIDER TRADING

The securities laws of most countries where we do business impose strict requirements on how we use and disclose material, non-public information (also known as "inside information") about publicly traded companies. Milliken is not a publicly traded company, but in the course of performing business with Milliken, you may learn inside information about our publicly traded customers, suppliers, subcontractors, acquisitions targets, or others.

You are not allowed to trade (buy, sell, or otherwise transact in) in stock or other securities based on inside information. You must not engage in tipping or recommend to anyone else that they buy or sell any securities based on inside information that you know.

BUSINESS CONDUCT

INTERACTIONS WITH MEDICAL COMMUNITY

When engaged with the medical community (including healthcare professionals, healthcare organizations, patients, patient organizations, government officials, and payors) on behalf of Milliken, you must adhere to any industry standard of conduct that applies (such as AdvaMed Sunshine Act and EFPIA Code of Practice). Any payment or benefit provided to a member of the medical community on behalf of Milliken must comply with all applicable legal and industry code requirements in the country in which the member of the medical community resides and/or practices medicine. The Physicians Payments Sunshine Act requires Milliken to track and then report annually certain payments and items of value given to physicians and teaching hospitals.

FINANCIAL INTEGRITY

You shall conduct your business, store documents, and perform financial reporting with integrity. Business transactions, assets, and liabilities will be recorded and documented in accordance with legal requirements.

GIFTS AND ENTERTAINMENT

Exchanging anything of personal value with Milliken's employees can (or can appear to) improperly influence business decisions, as well as create strain and awkwardness in the business relationship. Milliken employees are required to conduct their work solely in the interests of Milliken. They are prohibited from personally benefiting in a meaningful way from any external party's dealings with Milliken.

You are prohibited from giving anything more than modest gifts, meals, and entertainment to Milliken employees. Ordinary business meals and small tokens of appreciation such as gift baskets at holiday time generally are fine, but business partners should avoid offering employees travel, frequent meals, or expensive gifts. Gifts of cash or cash equivalents, such as gift cards, are never allowed.

ANTI- MONEY LAUNDERING

Money laundering is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds (e.g., drug trafficking, theft, tax evasion, corruption, etc.) look legitimate. We strive to combat money laundering and expect you to do the same by adopting adequate measures to ensure compliance with applicable national and international standards and laws.



RESOURCES

The following may be useful resources for additional information on implementing the principles and guidelines of Milliken’s Third Party Code of Conduct. For any questions, please contact your Milliken business representative, [Milliken Ethics](#), or submit an inquiry or report via [Milliken’s Ethics Helpline](#) at <https://mll.kn/SpeakUp>.

Our Helpline is a third-party managed confidential channel available for you to submit grievances or inquiries raised within our operations or your operations. Your employees and contractors are also able to report suspected violations of this Code to Milliken’s Ethics Helpline online or via 1-866-327-8419 (or [follow our international dialing instructions](#)).

[Business Principles for Countering Bribery](#)

[Circular Economy](#)

[CDP](#)

[CTPAT \(Milliken\)](#)

[CTPAT \(External\)](#)

[EcoVadis](#)

[International Labor Organization \(Child Labor\)](#)

[International Labor Organization \(Forced Labor\)](#)

[Ethical Trading Initiative](#)

[International Chamber of Commerce Anti-Corruption Guide for SMEs](#)

[International Bill of Human Rights](#)

[Responsible Care Global Charter](#)

[Responsible Sourcing Tool](#)

[Science Based Targets initiative](#)

[Sustainable Facilities Tool](#)

[U.K. Bribery Act](#)

[U.K. Modern Slavery Statement](#)

[United Nations Global Compact](#)

[United Nations Guiding Principles](#)

[Universal Declaration on Human Rights](#)

[United Nations Sustainable Development Goals \(SDGs\)](#)

[U.S. Foreign Corrupt Practices Act](#)

THIRD PARTY CODE OF CONDUCT

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This Third Party Code of Conduct supersedes and replaces the previously named Supplier Code of Conduct (last updated in 2025). Any reference to the Supplier Code of Conduct in any documentation or contracts with you is intended to refer to this Third Party Code of Conduct.

Milliken™