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MILLIKEN™

# 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

Be a values-based company with depth in materials science, customer intimacy, and operational excellence that delivers profitable growth and superior shareholder returns.

OUR VALUES



INTEGRITY

*Do the right thing*



EXCELLENCE

*Set a high bar for performance*



INNOVATION

*Reward big thinking*



SUSTAINABILITY

*Create a healthy future*



PEOPLE

*Empower exceptional teams*

# A MESSAGE FROM OUR CEO



**At Milliken, we have been creating innovative products and building a brighter future for 160 years.**

Our values compel us to do the right thing. We don't compromise on quality, integrity, or safety to succeed. Instead, we make sure that our business practices are as much a priority as our business results.

Our Code of Conduct is a guide for our associates and Board of Directors to live out our commitment to our values. While the Code does not address every situation or circumstance, it embodies our collective commitment and individual responsibility as we strive to make a positive impact on the world. It is our responsibility to understand and act consistently with the Code of Conduct as we conduct our business day to day. The Code provides advice and support for working with each other, with our customers and business partners, and within our communities.

It is up to each of us to live our values. Please follow our Code, ask questions, and raise any concerns you might have. Be comfortable speaking up and encourage others to do so as well. Thank you for all you do to build and protect Milliken's ethical culture.

**Halsey Cook**  
*President and CEO*

“ Our dedication to quality, integrity, and safety is steadfast. We ensure our business practices are held to the same high standards as our business results.

# DO THE RIGHT THING

This Code applies to our Board of Directors and all associates of the company and its subsidiaries when doing work for Milliken. The same ethical standards apply to all associates, regardless of job or level in the company. In certain circumstances, this Code also applies to contractors and temporary workers providing services at Milliken locations. It is the responsibility of each of us to be familiar with all policies and procedures relevant to our job functions.

## OUR SUCCESS DEPENDS ON EACH OF US DOING THE RIGHT THING.

We each agree to live our values and meet these important commitments:

- Understand our values and use them in your job
- Speak up regarding concerns
- Do not engage in or allow retaliation
- Know and follow our Code and policies that apply
- Support a strong culture of ethics
- Cooperate with investigations
- Ask for help

## OUR CULTURE DEPENDS ON YOU SPEAKING UP

Speak up—speak with a leader, Human Resources, or Legal regarding any concerns, issues or questions. If you do not wish to speak directly with someone at Milliken, then contact our Helpline:

- Speak with someone that doesn’t work for our Company
- All matters are confidential
- Make reports by phone (find your [local country](#) number at <https://mll.kn/SpeakUp>)
- Submit your questions or reports via the [web](#)
- All matters are responded to within 72 hours
- Review the [Helpline Impact Report](#) for a summary of actions taken

## NO TOLERANCE FOR RETALIATION

We have established processes and procedures to ensure that all internal investigations are conducted in accordance with our [Global Whistleblower Policy](#) which outlines our investigation process. We have personnel who have been trained to conduct investigations lawfully, promptly, thoroughly, professionally, fairly and confidentially.

We want you to report concerns. We understand it takes courage to speak up. Retaliation of any kind for making a genuine report is not allowed and would violate our [Global Non-Retaliation Policy](#).

Any retaliation, direct or indirect, for raising a concern or participating in an investigation is grounds for disciplinary action, up to and including termination. Contact [Ethics@Milliken.com](mailto:Ethics@Milliken.com) with questions or concerns.

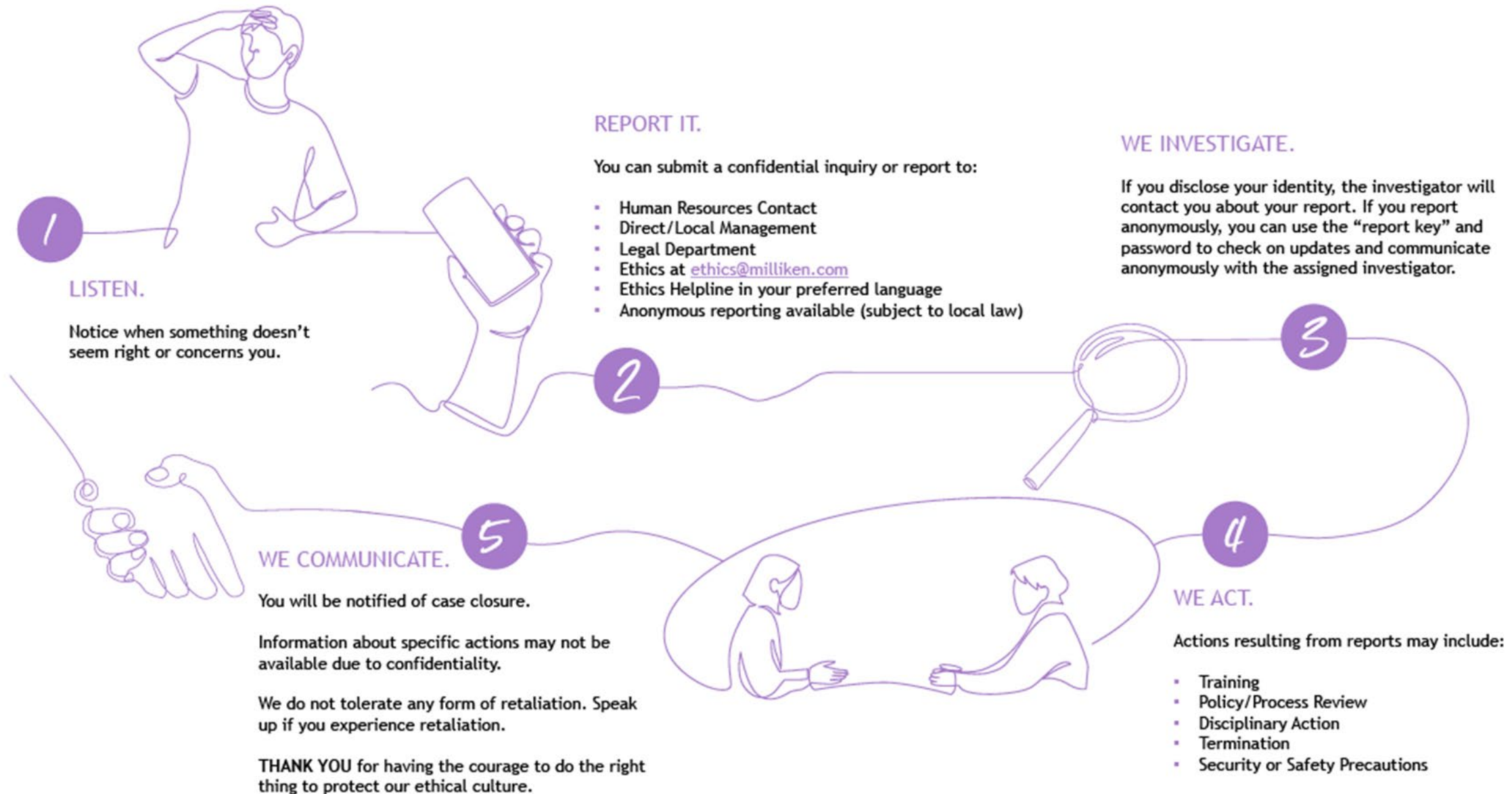
## HOW LEADERS SHOULD HANDLE CONCERNS

Leaders have a special responsibility to listen and act. Leaders should:

- Lead by example
- Listen carefully
- Elevate concerns appropriately and avoid the appearance of implicit approval
- Protect confidentiality
- Promote speaking up
- Communicate your support for ethical conduct
- Treat all concerns seriously
- Never cover up or ignore concerns
- Never retaliate



# ! INCIDENT REPORTING PROCESS





# PEOPLE

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# PEOPLE

## HEALTH AND SAFETY

The health and safety of our associates is everyone’s responsibility. This responsibility is critical to all our values. Our goal is to provide an injury-free workplace by following strict safety and health rules and practices including:

- ✓ Requiring every location to have an active, associate-led safety program that is strongly supported by its management team;
- ✓ Rigorously adhering to established safety procedures, following safety practices and avoiding shortcuts;
- ✓ Engaging in continuous improvement by proactively working to reduce occupational risks in our sites;
- ✓ Providing a secure working environment and responding quickly to any internal or external threats;
- ✓ Prohibiting the possession of weapons at any time on Company property unless specifically authorized to do so; and
- ✓ Prohibiting substance abuse (see Substance-Free Workplace section).

While compliance with all applicable laws, regulations and recordkeeping requirements is mandatory, we seek to go beyond the legally required minimums. It is our goal to provide an injury-free workplace. You must do your part and follow health and safety rules. You must report accidents, unsafe behavior, or unsafe work conditions to your manager, Human Resources, the legal department, or using our Helpline.

## PRODUCT SAFETY

Our [Product Safety Statement](#) requires that we carefully evaluate the safety of all products based on their intended use. We aim to understand both hazards and potential exposures using risk-based assessment methods.

Our [Quality Policy](#) commits all of us to strive to continuously improve our products and services so that we can provide innovative, better-quality products and services.

### HEALTH AND SAFETY SCENARIO

*A plant engineer tells another associate that the electric safety interlock on a machine is not working properly, so “be extra careful” while working around this machine. The associate immediately reports that the machine is not working properly to ensure it’s corrected and prevents harm.*



# PEOPLE

## FAIR TREATMENT

We are committed to respecting human rights in accordance with our [Global Human Rights Policy](#) which is guided by the principles found in the [U.N. Guiding Principles for Business and Human Rights](#); [U.N. Universal Declaration of Human Rights](#); [International Bill of Human Rights](#), and [the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work](#). We strive to uphold global standards for responsible business, including compliance with labor regulations; providing safe working conditions; non-discrimination and equal opportunity; the freedom to associate and bargain collectively; data privacy; security; and the elimination of modern slavery, human trafficking, and harmful or exploitative forms of child labor. We will treat one another with courtesy, dignity, and respect.

Each of us is entitled to equal opportunity and fair treatment. We prohibit discrimination based on age, disability, ethnicity, national origin, class/caste, race, color, religion, military or veteran status, genetic information, sex, gender identity, sexual orientation, or any other characteristic protected by law. Decisions related to any aspect of employment are to be based on qualifications as they relate to the job.

In addition to complying with U.S. Equal Employment Opportunity (EEO) laws, we must comply with all other civil rights, human rights, and labor laws around the world where applicable. We strictly prohibit the use of child labor or involuntary labor. We prohibit the use of child labor, forced labor, compulsory labor, slavery, prison labor, indentured labor, bonded labor or use corporal punishment or other forms of mental and physical coercion as a form of discipline in any of our global operations or facilities.

### UNFAIR TREATMENT SCENARIO

*An associate develops a marketing campaign for a customer. The associate’s manager explains that they plan to present it to the customer without the associate present because the customer would be more comfortable with someone who is not in a wheelchair. The manager “assumed” the associate wouldn’t want to make the trip.*

*Disabilities should not be considered when making business decisions unless an associate has specifically requested an accommodation. Speak to your manager or report this behavior to Human Resources, Legal, or using our [Helpline](#).*

## HARRASSMENT-FREE

At Milliken, we know that empowered people make exceptional teams. Promoting teamwork and excellence demands a working environment that is free from discrimination, harassment, bullying or other intimidating personal behavior. We must maintain a professional and harassment-free working environment. We must act with respect and courtesy toward one another and for those with whom we do business.

The following behavior is expressly prohibited:

- Unwelcome conduct – whether verbal, written, physical or visual – that is based on a person’s protected status such as race, color, religion, sex, gender identity, age, nationality, disability, class/caste, sexual orientation, military or veteran status, pregnancy, genetic information, or any other protected status.
- Abusive language, communications, or physical behavior that deliberately causes injury to another or any disorderly conduct or malicious disturbance. This includes intimidation or harassment of others; and sexual harassment, which is conduct based upon sex, whether directed toward a person of the same or opposite sex. This includes unwelcome sexual advances, requests for sexual favors, and other physical, verbal, written, or visual conduct based on sex when:
  - Submission to the conduct is an explicit or implicit term or condition of employment or advancement; or
  - The conduct has the purpose or effect of unreasonably interfering with the person’s work performance by creating a hostile, offensive or intimidating work environment.

Our [Anti-Harassment Policy](#) (internal) applies to work-related settings, electronic communications, and company organized activities outside of the workplace.

### HARRASSMENT SCENARIO

*An associate has a habit of telling offensive jokes – sex jokes, racial jokes, denigrating jokes – about everyone. These inappropriate jokes have been sent internally and externally using the company e-mail system.*

*Milliken does not tolerate this type of behavior and strives to maintain a harassment-free work environment for all associates. Any conduct that conflicts with this policy must be reported.*

*Speak with your manager, Human Resources, Legal, or submit a report using our [Helpline](#).*



# PEOPLE

## ANTI-VIOLENCE

We have a zero-tolerance policy for workplace violence. This includes physical or verbal assault, or threats of violence on our premises or outside the workplace. Workplace violence also includes any violent act by a third party against our associates. You should report any threatening or violent behavior to your manager, Human Resources, or via the [Helpline](#) immediately.

## SUBSTANCE-FREE

We understand that substance abuse – whether alcohol or drug abuse – has an adverse effect upon our goal to maintain a safe and injury-free workplace. Our substance-free workplace policy extends to all our locations and applies to associates, directors, business partners, and guests. Our [Substance-Free Workplace Policy](#) (internal) prohibits:

- Being under the influence of alcohol, illegal drugs or any other controlled substance on the job; and
- The use or possession of alcohol, illegal drugs or other controlled substances in the workplace or on Company property.

The possession of prescription medication for medical treatment is permitted so long as its use does not impair the performance of job-related functions. The misuse of legitimate prescription drugs is prohibited.

### SUBSTANCE ABUSE SCENARIO

*A sales representative, frequently entertains customers at lunch and regularly has two or three drinks. The sales associate returns to work with a little “buzz”. Associates should avoid drinking during lunchtime which falls during working hours.*

*Alcohol and drug abuse pose a threat to the health and safety of associates and to the security of our equipment and facilities. If you observe substance abuse at work, you are responsible for speaking up to prevent a safety incident. Speak with your manager, Human Resources, Legal, or submit a report using our [Helpline](#).*

## FUNCTIONS INVOLVING ALCOHOL

There may be Company-sponsored events or functions where management approves the serving of alcoholic beverages. In these cases, all applicable liquor laws must be followed including prohibitions against serving alcohol to those under the legal drinking age. Consistent with our policy, intoxication and excessive drinking at these events is prohibited.







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# PLANET

## ENVIRONMENT

We strive to operate in an environmentally conscious manner through waste reduction, pollution prevention, and the efficient use of resources. We operate our plants and facilities in compliance with applicable environmental laws and regulations as a minimum requirement.

## WASTE

We must all ensure the safe and compliant handling, storage, transportation, disposal, recycling, reuse, and management of waste and wastewater discharges.

## ENVIRONMENTAL HEALTH

We understand that any activity that has the potential to adversely impact human or environmental health must be appropriately managed, measured, and controlled. We must minimize the release of hazardous substances and give special attention to active ingredients. We must prevent or mitigate accidental spills and emissions of hazardous materials.

## RESOURCE CONSERVATION

We are committed to using natural resources, such as energy, water, and raw materials, in an efficient way and preserve them. Circular economy principles are expected.

## CLIMATE PROTECTION

We go beyond compliance by setting metrics to reduce our greenhouse gas emissions. Our Net Zero targets are Science Based Target initiative validated and drive us to reduce emissions aligned with other businesses in a common framework. We also seek to reduce, reuse, or recycle our waste to the extent economically feasible. We are vigilant to ensure that practices, metrics, and policies are relevant and visible to stakeholders with public disclosures available in our annual Sustainability Report.

### ENVIRONMENTAL POLICY SCENARIOS

*A process engineer instructs associates to dump used machine oil down a drain in one of the laboratories to save on recycling costs. The associates should report the process engineer for this misconduct.*

*A facilities manager notices a leak of refrigerant gas from the air conditioning system but decides not to act on it to avoid repair costs. Refrigerant gases can contribute to ozone depletion and global warming. This should be reported as it violates our environmental policies.*

*A plant manager tells a contractor responsible for the removal of organic waste material, “Just don’t tell me what you do with this stuff.” The contractor should consider this a red flag and report it.*

*If you believe certain actions may cause harm, you should speak-up and raise your concerns. Speak with your manager, Human Resources, Legal, or submit a report using our [Helpline](#).*





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# BUSINESS CONDUCT

## CONFLICTS OF INTEREST

A conflict of interest exists when you have (or could appear to have) divided loyalties – when you have a personal interest that might reasonably appear to affect your objective and effective judgment, influence your actions, or lead you to neglect your duties to Milliken. It is our policy that we are expected to avoid any actual or apparent conflict of interest and any situation that involves, or could involve, a conflict of interest with Milliken must be disclosed to [Legal](#) immediately.

## AVOIDING CONFLICTS OF INTEREST

The potential for conflicts of interest does not end when you leave work. We are expected to manage all our business relationships with our work responsibilities in mind. Even outside of work, we must keep in mind the need to avoid any situations that might lead to a conflict or the appearance of a conflict between personal interests and the interests of Milliken.



Remember, the existence of a real or potential conflict of interest is not necessarily a violation of our policies; however, continuing to work in any role, or participating in any decisions that involves a conflict of interest without disclosure, is a violation

## EXAMPLES OF CONFLICTS OF INTEREST

- *You or an immediate family member owning, or having a financial interest in, a Milliken supplier, customer, consultant or competitor (other than shares of a publicly traded company whose shares are listed on a major stock exchange). Immediate family members include spouses, domestic partners, children, stepchildren, parents, stepparents, siblings, in-laws and any other related person with whom you share a residence;*
- *Owning your own business or working for another business while you are employed by Milliken using the same or similar skills or training that you use at work to such an extent that it distracts from your job at Milliken;*
- *You manage someone with whom you have a family, romantic or dating relationship. Your relationship will likely be seen as influencing your judgment;*
- *Serving as a director, officer or consultant to a Milliken customer, supplier or competitor while you are employed by Milliken (including volunteer or unpaid positions);*
- *Accepting compensation, in any form, for services performed for Milliken from any source other than Milliken; and*
- *Taking personal opportunities that are discovered through the use of Milliken property, information or your position or competing with Milliken, directly or indirectly, for business opportunities.*

This list is not exhaustive. If your situation is not covered, review the [Global Conflicts of Interest Policy](#) (internal) and ask yourself these questions:

- Do my outside interests influence, or appear to influence, my ability to make sound business decisions?
- Do I stand to personally benefit, or appear to benefit, from my involvement in this situation? Does a friend or relative of mine stand to benefit or appear to benefit?
- Could my participation in this activity interfere, or appear to interfere with my ability to do my job?
- Is the situation causing me to put my own interests ahead of Milliken's interests? Does it appear to?
- If the situation became public knowledge, would I be embarrassed? Would it embarrass the company?

If the answer to any question above is yes, you may have a potential conflict of interest that should be disclosed. Submit a [Conflicts of Interest Disclosure](#) form or contact Legal if you have a situation that is an actual or perceived conflict of interest. If a conflict of interest can be managed, the Company will work with you to determine the appropriate course of action.

Remember, you must promptly disclose an actual or potential conflict of interest when hired, when the conflict arises during your employment, and annually during our conflict of interest training and policy review process. This is an ongoing responsibility.



# BUSINESS CONDUCT

## GIFTS AND ENTERTAINMENT

The giving and receiving of gifts and entertainment are courtesies designed to build goodwill between companies. They foster positive working relationships between us and our customers, vendors, and suppliers. When performed within established limits, these activities continue to be a lawful and appropriate business practice. Conflicts may arise, though, if gifts and entertainment are offered with the intent to influence a business decision, are frequent, are of substantial value, could create the appearance of a conflict of interest, or could violate laws, rules, or regulations.

Business decisions should never be based on gifts and entertainment received or given through our business relationships. We should avoid the appearance of making business decisions based on gifts and entertainment.

### Gifts and entertainment accepted or provided must:

- |   |   |
|---|---|
| ✓ Have a legitimate business purpose;<br>.....  | ✓ Not knowingly conflict with the policies of the receiver;<br>.....  |
| ✓ Be consistent with Company values and policies;<br>.....  | ✓ Not be in the form of cash or cash equivalents (i.e., gift cards);<br>.....   |
| ✓ Be infrequent, in good taste, of nominal value (less than US\$100 or equivalent), and unsolicited;<br>..... | ✓ Not embarrass you or the Company if they were publicly disclosed;<br>.....  |
| ✓ Comply with laws and regulations;<br>.....  | ✓ Not create a feeling of obligation, compromise your judgment, or appear to inappropriately influence you or the recipient; and<br>.....                       |
| ✓ Not be given as a bribe, payoff, or kickback;   | ✓ Be discussed with and approved by your manager if they exceed the gift limit or you have concerns regarding the appropriateness of the gift or entertainment. |



Occasionally, associates may accept or provide gifts or entertainment that exceed US \$100. When this occurs, the associate is subject to the reporting or pre-approval requirements as described in the [Gift and Entertainment Policy](#) and must submit the [Gifts & Entertainment eForm](#) (internal). Any time gifts or entertainment may be seen as being given on behalf of Milliken, this policy **must** be followed.

If you are unsure of the reasonableness or appropriateness of a particular meal or entertainment event, you should consult with your manager, Finance, or Legal.



# BUSINESS CONDUCT

## GIFTS, MEALS, AND ENTERTAINMENT INVOLVING PUBLIC OFFICIALS

The sale of goods and services to most governments or into their supply chains is heavily regulated. If you are involved in sales to governmental customers or their supply chains, then you must take necessary steps to ensure that all government-related transactions and relationships comply with applicable laws and regulations. Gifts and entertainment are generally inappropriate and often illegal where public officials and their supply chains are concerned. Always consult with Legal before making any offer of gifts or entertainment to any public official or their supply chains.

### IMPROPER GIFTS AND ENTERTAINMENT

*A vendor hands out gift cards to associates at a plant as a holiday “thank you” for their continued partnership and business. These gifts should be reported and returned as inappropriate.*

*A vendor offers Milliken associates redeemable points that vary, and increase based on spend level with continued business. Once a certain level of points accrues, associates then redeem for gifts such as jewelry, camping gear, or sports merchandise. This type of gift arrangement could improperly influence our associate’s purchasing decisions and should be reported to Human Resources.*

*An associate at Milliken is negotiating the terms of a contract with a senior government procurement official. The associate offers the official a gift of a wristwatch and invites them to play golf at an exclusive club in violation of Milliken’s gifts and entertainment policy.*

*If you have questions or concerns, speak with your manager, Human Resources, Legal, or submit a report using our [Helpline](#).*

### ACCEPTABLE GIFTS AND ENTERTAINMENT

*During the holiday season, a supplier sends a large gift basket filled with gourmet foods and wines to the department as a token of appreciation for their hard work throughout the year.*

*A supplier sends a package of branded promotional items, including high-quality pens and notebooks, to the office as a thank-you gesture for recent purchases.*

*These shareable and de minimis value gifts are acceptable under Milliken’s gifts and entertainment policy.*



# BUSINESS CONDUCT

## ANTI-CORRUPTION

We do not tolerate bribery, corruption, or unethical practices of any kind. No one acting on behalf of Milliken, whether directly, or indirectly, is permitted to make or receive bribes or improper payments. Such prohibited improper payments may be cash, but it also may be gifts, entertainment, travel, or the promise of a reward at a future date. Offering anything of value for the purpose of influencing a business decision is wrong.

We must avoid any interaction with a public official, or someone that works for a publicly-owned company or political organization that could even appear improper. You must report any suspected violations of our [Global Anti-Corruption Policy](#) (internal) or any requests for a bribe or improper payment immediately.

## 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. You must guard against suspicious activity and illegal customer or supplier financial transactions for the purposes of money laundering. Suspicious activity may include large cash payments, small cash installment payments, payments made in atypical currencies, payment requests that vary from the contractual amount, or payments by an individual or company that is not a party to the contract. Any suspicious activity should be reported to Finance or Legal immediately.

## FRAUD

Fraud means deception intended to achieve financial or personal gain. Fraud is dishonest and sometimes criminal. Intentional acts of fraud are subject to strict disciplinary action including termination and possible civil or criminal prosecution. We have a responsibility to report known or suspected fraud.

It is important for us to understand fraud so that we can recognize and avoid it. Some examples of fraud include:

- Submitting falsified expense reports or causing a peer or subordinate to do the same;
- Forging or altering checks;
- Misappropriating assets or misusing Company property;
- Unauthorized handling or reporting of transactions;
- Inflating sales results by shipping inventory known to be defective, non-conforming, or before they are needed by our customer;
- Making an entry on business records or financial statements that is known to be inaccurate or not in accordance with proper accounting standards or guidelines;
- The inappropriate destruction or alteration of business records (remember our obligations on Recordkeeping, Financial and Accounting Controls); and
- Improper or unlawful conduct with respect to trade.

## FRAUDULENT BEHAVIOR THAT SHOULD BE REPORTED

*A customer takes a sales associate out to dinner after a sales presentation. The sales associate then expenses the same \$65 dinner on his expense report.*

*A financial controller loans her associates money from the Company, charges them interest, and deposits their repayments into her personal bank account.*

*In an effort to win a £5 million order from a prospective customer, an associate knowingly misrepresents the attributes of our product.*

*This type of misconduct may result in disciplinary action up to and including termination. When in doubt, speak with your manager, Human Resources, Legal, or submit an inquiry using our [Helpline](#).*

## FAIR DEALING

We must deal fairly with all our customers, third parties, competitors, and associates. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation, or any other form of unfair dealing.



# BUSINESS CONDUCT

## ANTITRUST AND ANTI-COMPETITIVE BEHAVIOR

We are committed to fair and honest competition. All of us, but especially those working in marketing, sales, sourcing, business management, or those participating in trade associations or industry groups, must understand and comply with antitrust and fair competition laws. We must exercise caution regarding the topics discussed in these forums.

Antitrust laws exist in virtually every country in which we operate. These laws:

- Prohibit agreements between competitors that eliminate or discourage competition;
- Regulate behavior of dominant companies; and
- Require advance approval or notification of some acquisitions or other transactions.

Antitrust and competition laws can be very complex. Determining what actions are improper often depends on the structure of the market and other factors. To avoid even the perception of unlawful conduct, we should avoid:

- Discussing prices, bids, costs, credit terms, products, product attributes, services, bidding practices, sales territories, distribution channels, customers, non-public business matters, or any other confidential information with a competitor;
- Restricting the right of a customer to sell or lease a product or service at, above, or below a certain price; and
- Boycotting customers.

Additionally, the following practices should be undertaken only with prior review by Legal:

- Conditioning, “tying,” or “bundling” the sale or lease of a product or service on the sale or lease of another product or service;
- Conditioning the purchase, sale, or lease of a product or service on a reciprocal agreement with a customer or supplier;
- Entering into an exclusive arrangement with a customer, or supplier, agent, distributor;
- Limiting a customer, agent, distributor, or supplier’s territories; and
- Licensing of technology.

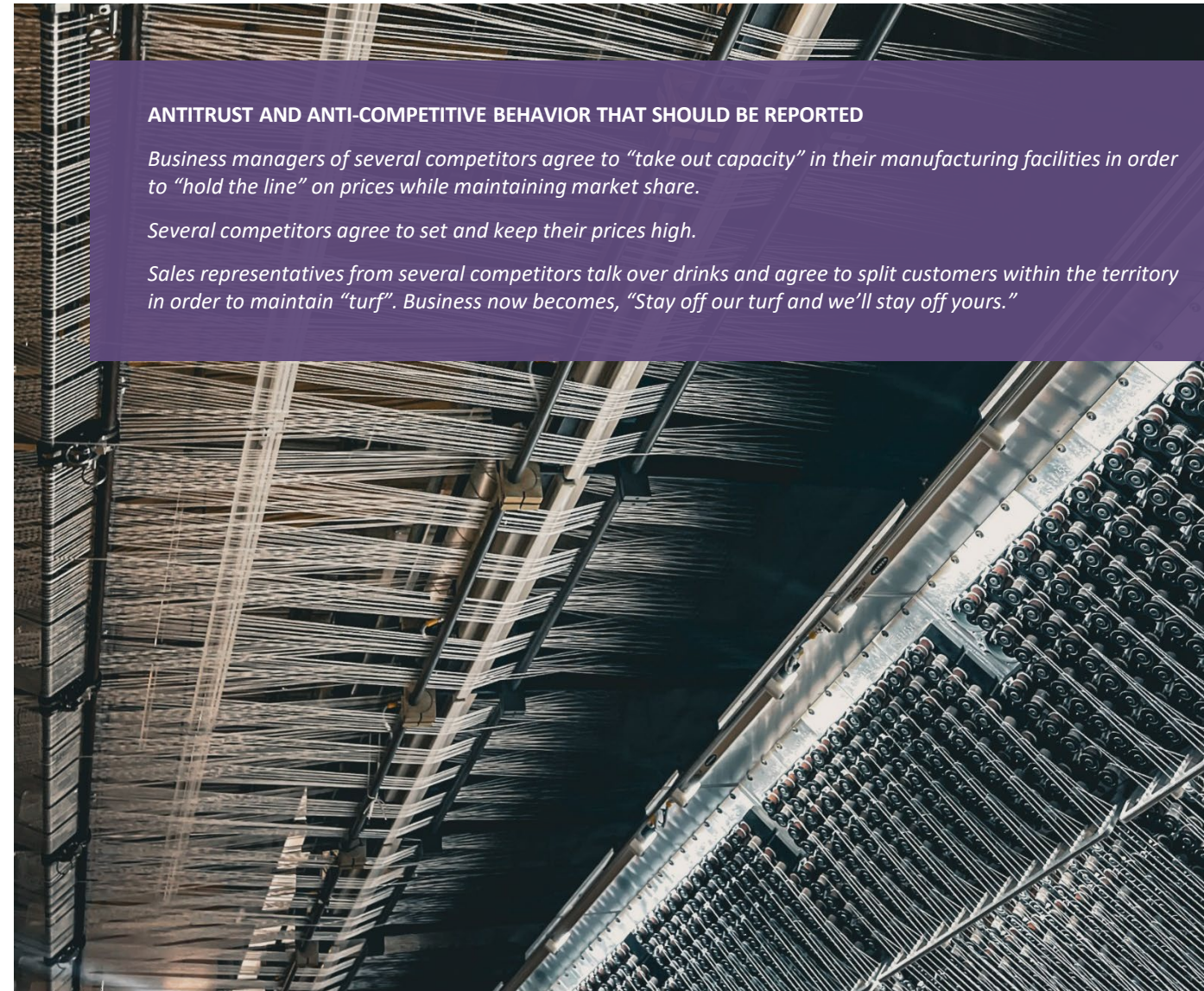
Contact Legal for specific rules applicable to your business in a particular region.

### ANTITRUST AND ANTI-COMPETITIVE BEHAVIOR THAT SHOULD BE REPORTED

*Business managers of several competitors agree to “take out capacity” in their manufacturing facilities in order to “hold the line” on prices while maintaining market share.*

*Several competitors agree to set and keep their prices high.*

*Sales representatives from several competitors talk over drinks and agree to split customers within the territory in order to maintain “turf”. Business now becomes, “Stay off our turf and we’ll stay off yours.”*





# BUSINESS CONDUCT

## INTERNATIONAL BUSINESS

Most countries have laws regulating international trade including imports, exports, free trade agreements, and international financial transactions. It is our responsibility to know and follow these laws as well as related company policies and procedures. The consequences of violating trade laws are severe both for the Company and for the individuals involved.

## TRADE SANCTIONS, EMBARGOES, AND EXPORT CONTROL LAWS

We will comply fully with applicable export control laws as well as all other applicable laws in any country in which we operate. We are responsible for knowing who we are dealing with and must not do business with individuals, entities or countries specifically prohibited by law or with individuals, entities, or countries that fall under applicable trade embargoes or economic sanctions. We must also be aware of and comply with any product-specific trade restrictions that may apply. Examples include restrictions on military or dual-use items. Be aware that U.S. export rules and embargoes often apply to our foreign subsidiaries and associates.

## CUSTOMS LAWS

Import laws require us to make accurate declarations regarding items being imported and to pay applicable customs duties and related taxes. We will comply with all import regulations wherever we conduct business, and we will never seek to avoid paying legal duties, taxes, and fees, or to evade the legal requirements of international trade by misrepresenting the facts of a transaction.

## FAIR TRADE AGREEMENTS

Preferential trade agreements (also known as “free trade agreements”) have been adopted to stimulate trade between countries or groups of countries by reducing or eliminating customs duties and taxes on qualifying goods. The effective use of free trade agreements is important to our success. In many cases, very complex qualification processes are required to gain the benefits of the agreements. We will only participate in a free trade agreement if all legal requirements are met.

## ANTI-BOYCOTT

The U.S. anti-boycott laws generally prohibit U.S. companies and their subsidiaries from cooperating with international boycotts not sanctioned by the United States government. U.S. companies and their worldwide subsidiaries must report any requests they receive to engage in boycotting activities to the U.S. government.

In addition, other jurisdictions where Milliken operates or does business, including the European Union, may have similar anti-boycott requirements.

If you have questions regarding these or other trade-related regulations, please contact Trade Compliance or Legal.

## SUSTAINABILITY

We understand that a commitment to sustainability today provides a healthy world for future generations. Sustainability is a core value and an enabler of our business strategies. We are all expected to incorporate sustainability into our decision-making processes.

### IMPROPER INTERNATIONAL BUSINESS PRACTICES THAT SHOULD BE REPORTED

*A supply chain manager certifies to a customer that our product qualifies for US-Korea Free Trade Agreement benefits without obtaining the necessary certifications from our raw material suppliers.*

*A Middle Eastern customer requires us to certify that we will not do business with any Israeli firm.*

*A shipping associate prepares an invoice knowing that the valuation, description of the goods to be exported, and country of origin included in the shipping documents are inaccurate.*

## RESPONSIBLE SUPPLIERS

We commit to treating our suppliers with integrity and respect. We expect our suppliers to uphold the ethical business principles of Milliken’s [Supplier Code of Conduct](#).

# BUSINESS CONDUCT

## OUR CONFIDENTIAL INFORMATION

Our business information is very valuable and must be protected. Confidential information includes all non-public information that might be of use to competitors or harmful to Milliken if disclosed or is subject to an obligation of confidentiality by Milliken.

You are expected to respect our confidential business and financial information (“Confidential Information”) by complying with our [Global Confidential Information Policy](#) (internal). This includes:

- ✓ Only using Confidential Information for Milliken’s business purposes and for the benefit of Milliken.
- ✓ Handling Confidential Information strictly in accordance with the classification levels set out in the [Global Confidential Information Policy](#);
- ✓ Ensuring that Confidential Information is only shared with third parties where the requirement of the [Global Confidential Information Policy](#) have been met;
- ✓ Only sharing Confidential Information with other Milliken associates who have ben authorized to receive it and need it to perform their job; and
- ✓ Complying with clear desk requirements.

Confidential Information must not be used for personal gain.

Obligations to confidentiality extend beyond our tenure at Milliken. Even after leaving Milliken, confidential information must not be disclosed in any way. At the same time, confidential information that was obtained at a previous employer, including but not limited to trade secrets, must not be disclosed to Milliken.

Please note that this confidentiality obligation does not restrict you from raising concerns about a potential Code or legal violation through the appropriate channels within the Company, or with a government agency, either during or after your employment. Specifically, you are not restricted from filing a complaint with, communicating with, providing information to, or participating in an investigation or proceeding before a government agency.

## THIRD PARTY CONFIDENTIAL INFORMATION

We are expected to respect the confidential information of third parties by treating it with the same degree of confidentiality that would be used in connection with Milliken’s confidential information.

## INFORMATION SECURITY

You must safeguard the confidentiality of Milliken’s confidential data by adhering to established information security protocols, attending regular training on information security best practices, and complying with all applicable information security policies, standards, and laws. For more information, please review our Cyber Security Policies (internal).

## DATA PROTECTION AND PRIVACY

You may receive personal information from associates, customers, suppliers, and other parties in the normal course of business. Personal data or personally identifiable information (PII) broadly refers to any information either by itself or in combination with other information that can directly or indirectly be used to identify a natural person. Examples of personal data include, but are not limited to, names, identification numbers, email addresses, individual phone numbers, IP addresses, or location data. We are committed to collecting, processing, and protecting personal information responsibly and in compliance with Milliken policies and all applicable privacy and information security laws. For more information on how we protect personal data, please review our Data Privacy Policies and Processes (internal) and our [Privacy Notices](#) for additional information.

## USE OF ELECTRONIC RESOURCES

We commit to using Milliken’s electronic resources wisely. Your use of our systems must comply with our [Cyber Security Policies](#) and the [Acceptable Use Policy](#) (internal). You must be careful when using electronic resources in public. When working, use only devices and systems managed and maintained by Milliken, unless otherwise authorized. All devices must meet our security standards. Always be cautious when downloading or opening attachments or software from unknown sources. If you suspect a security-related incident or become aware of any situation in which data may have been compromised, including, but not limited to, the loss or theft of a laptop or handheld device or malware infection, immediately report the situation to Cyber Security.

## ASSET MANAGEMENT

Asset management is the process of ensuring an organization’s assets are properly accounted for, deployed, maintained, upgraded, and securely disposed. All physical and technology assets provided by the Company, whether used inside or outside the Milliken workplace, are Company property and are provided for our business use.

## ARTIFICIAL INTELLIGENCE (AI)

It is everyone’s responsibility to use caution and common sense when using AI technology. When we leverage AI in our work, we must act ethically and responsibly, consistent with our [Artificial Intelligence Use Policy](#) (internal).

# BUSINESS CONDUCT

## MARKET INTELLIGENCE

We have an obligation to stay informed of developments in the markets in which we participate, but market intelligence must be collected ethically and in compliance with all applicable laws. When seeking information about other market participants, the following guidelines must be strictly followed:

- ✓ Do not enter private property illegally;
- ✓ Do not use covert listening or viewing devices or methods;
- ✓ Do not misrepresent yourself, your intent, or your affiliations for the purpose of securing information;
- ✓ Always respect proper requests for confidentiality;
- ✓ Do not offer bribes in any form in exchange for information; and
- ✓ Do not use the job interview process for the purpose of seeking competitive information. Advise job candidates against volunteering information that might be considered proprietary by their current or former employer.

Contact Legal if you have a question about the ethics or legality of any situation or proposal related to the collection of market intelligence.

## IMPROPER COLLECTION OF COMPETITIVE INFORMATION

*An associate has been given the assignment to do a market study. During that study, the associate conducts interviews of several market participants misrepresenting themselves as a student conducting research for a PhD dissertation. The market and financial information this associate receives from these companies would not otherwise have been made available.*

*Associates should not gain market intelligence by violating our Code. These actions should be reported to management, Human Resources, Legal, or through our [Helpline](#).*





# BUSINESS CONDUCT

## INSIDE INFORMATION AND TRADING SECURITIES

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 your job, you may learn inside information about our publicly traded customers, suppliers, subcontractors, acquisitions targets, or others.

It is important to understand the following terms:

- “Material” information is information important enough that it could affect an investor’s decision to buy, sell, or hold securities (stocks, stock options, bonds, notes, debentures, put, and call options). Examples of material information might include: news of mergers, acquisitions, or divestitures; a planned securities offering; major regulatory actions or litigations; significant new products or changes in senior management.
- “Non-public” means the information has not been disclosed to the general public or is otherwise unavailable to the other party to a securities transaction.

We are not allowed to trade in stock or other securities based on inside information. You must not recommend to anyone else that they buy or sell any securities based on inside information that you know. Finally, you must not disclose any inside information about a company unless it is relevant to our business activities.

If you are a Milliken stockholder, you are prohibited from buying, selling, or trading in Milliken stock on the basis of material, non-public information. Until all material, non-public information that you know about Milliken has been made available to the other party to the transaction, you may not buy, sell, or trade in Milliken’s stock. If you are concerned that you may be in possession of material, non-public information at the time of a stock transaction, you should consult counsel who can help you understand your obligations.

### MATERIAL, NON-PUBLIC INFORMATION THAT SHOULD NOT BE DISCLOSED

- *Significant expansion or reduction of operations*
- *Projections of earnings or losses*
- *Unreleased business results*
- *Significant changes in business*
- *Major management changes*
- *Major new contracts or projects*
- *Major lawsuits*

### IMPROPER USE OF INSIDE INFORMATION THAT SHOULD BE REPORTED

*An associate learns that Milliken is in negotiations to purchase a smaller publicly traded corporation with technology that the Company needs. She purchases convertible bonds issued by the corporation to be acquired.*

*An engineer learns that the Company is considering entering a partnership with another company to improve global representation. Neal immediately calls his family and encourages them to purchase stock in the Company’s partner.*

*Three days before the public announcement of the quarterly earnings of one of the Company’s suppliers, an associate hears from that supplier’s salesman that Wall Street will be disappointed with their quarterly results. On the way home from work that evening, the associate calls their broker to sell the supplier’s stock.*

*Milliken is not a publicly traded company, but in the course of performing your job, you may learn material inside information that should not be used for personal gain.*

# BUSINESS CONDUCT

## POLITICAL ACTIVITY

We encourage you to be an engaged member of your community. This includes being an active, knowledgeable participant in the political process and public policy engagement (Political Activity).

On occasion, we will present educational material on political issues that affect your job or livelihood to assist you in making informed choices. However, it is expressly forbidden to pressure others to make political contributions or to participate in support of a particular political party or candidate. Our political contributions or communications on issues of public concerns are not intended to influence you to adopt certain ideas or support certain causes. Your decisions to contribute your own time or money to any Political Activity are entirely personal and voluntary.

Political Activity, including political contributions, are highly regulated and restrictions and requirements differ globally. It is critical that you do not:

- ✓ Engage in political activity on behalf of Milliken (either directly or through third parties, such as consultants or trade associations) without the direct involvement of Milliken’s Government Relations Office; or
- ✓ Use Milliken’s funds or resources (e.g., money, facilities, phones, emails, letterhead), receive monetary reimbursement, or represent yourself as acting on behalf of the Company in political activities, before government agencies, on boards of directors, or other advisory positions unless specifically authorized to do so.

Questions regarding Political Activity should be sent to our Government Relations Office.

### INAPPROPRIATE POLITICAL ACTIVITY THAT SHOULD BE REPORTED

*An associate distributes fliers in the cafeteria at work promoting a political candidate running for local council.*

*An associate contributes Company funds to a customer’s favorite political action committee.*



## COMMUNITY ENGAGEMENT AND CHARITABLE GIVING

We encourage you to give back to your communities and participate in company outreach efforts including volunteerism. Charitable outreach and giving is a personal decision and completely voluntary. Please review our Volunteer Program Policy (internal) for more information on volunteering. When engaging in charitable giving, remember to secure prior approval before committing company funds or assets to an organization. Learn more about the [Milliken Foundation](#) and our giving pillars on our website.



# BUSINESS CONDUCT

## MEDIA RELATIONS

Keeping the general public informed is part of our community relations activities, but information must be delivered in a professional manner that protects our values and aligns with our purpose.

We will not make any unauthorized or confidential disclosures to the media. The Company has the right to and will protect its privacy and that of its associates and their families. All responses to media inquiries must be coordinated and approved by Milliken Marketing Services.

Inappropriate media responses might include:

- Any information regarding the Company’s financial condition;
- Comments on rumors about an acquisition, lawsuit or other significant event;
- Information about management changes;
- Comments about new products, policies or strategies; or
- Information about our shareholders.

Our credibility and effectiveness depend on communicating accurate information. This is especially applicable in crisis situations. You should not act as a Company representative without clear prior approval from Milliken Marketing Services, Legal, or the Senior Leadership Team.

### MEDIA ENGAGEMENT SCENARIOS

*A marketing manager gives an interview with the local newspaper and describes exceptionally strong sales as one of the reasons behind the Company’s success. As a privately held company, we do not publicly disclose our financial earnings.*

*A trade reporter asks a process engineer how his group got the idea for a new process for finishing a line of industrial fabrics. The process engineer proudly describes the exciting new product development process in detail. The associate may have innocently disclosed confidential information in his excitement. This should be reported for Legal and Marketing to manage appropriately.*



# BUSINESS CONDUCT

## RESPONSIBLE MARKETING

As a trusted business partner, we have an important responsibility to market our products accurately and transparently to all customers and end-users. You are expected to always represent our products truthfully, responsibly, and in adherence to all relevant laws and regulations in the countries where we operate. You must never:

- ✓ Overstate or misrepresent the qualities of our products;
- ✓ Use misleading or untruthful statements in any statements or advertisements; or
- ✓ Make claims, including claims about health effects or sustainability of our products, without adequate substantiation and proper internal clearance.

Be sure to follow local marketing review and approval processes for external-facing content. Contact our Milliken Marketing Services team for more information.

## SOCIAL MEDIA

Social media continues to change the way we communicate and share information. While social media creates new opportunities for discussion and collaboration, it also brings additional responsibilities.

Examples of social media are described in our Global Social Media Policy (internal) and can include, but are not limited to, networking sites, blogs, photo and video sharing sites, forums, and chat rooms.

If your responsibilities require posting on social media sites, you must only post information for authorized business purposes that complies with Company policies. In your personal social media activities, act responsibly and protect our reputation. Questionable statements or images posted by you may reflect negatively on us. Never post confidential information about the Company, colleagues, customers, suppliers, or business partners on social media sites.

Contact the Milliken Marketing Services at [socialmedia@milliken.com](mailto:socialmedia@milliken.com) if you have questions about the use of social media or our [Global Social Media Policy](#) (internal).



### IMPROPER SOCIAL MEDIA USAGE THAT SHOULD BE RPEORTED

*A production manager posts their department's holiday run schedule on Facebook to communicate with their team.*

*A finance associate working on a potential acquisition starts connecting with employees of the target company via LinkedIn prior to the acquisition being officially announced.*

*These type of actions could lead to disclosure of sensitive information and should be reported immediately.*



# BUSINESS CONDUCT

## RECORDKEEPING, FINANCIAL AND ACCOUNTING CONTROLS

Complete, accurate and timely records, proper accounting and internal controls provide the core information that is necessary to manage our business. This information is essential to our success and fulfilling our obligations to our management, Board of Directors, and shareholders.

All internal and external financial records and information must be prepared and maintained accurately:

- ✓ In compliance with local, state and federal laws and with US Generally Accepted Accounting Principles (GAAP), International Financial Reporting Standards (IFRS), and other statutory reporting requirements, as applicable;
- ✓ In an environment characterized by effective internal controls that protect and enhance our values, purpose, resources, and assets.

Our financial information must be held confidential and only made available to those associates and external parties when approved by Finance or Legal.

## COMPLETENESS AND ACCURACY OF BUSINESS RECORDS

All business transactions must be properly authorized and completely and accurately recorded in compliance with all applicable policies. Improper entries to financial records must be reported to Legal, Finance, or Human Resources.

## COMMUNICATING ACCURATE AND TIMELY INFORMATION

We are expected to be accurate and timely in all interactions and communications whether with customers, suppliers, government agencies or others inside or outside of our Company. Communications must be free from misleading statements or misinformation. In the event of a clerical or accounting error, it is our policy to advise customers, suppliers, or other business partners of the mistake and to promptly correct it through mutually acceptable means.

## RECORDKEEPING AND RETENTION

We are responsible for knowing all applicable record retention policies, procedures, and legal requirements, including how data is stored, retrieved, and archived. It is our responsibility to know how to document, maintain and report any information and records for which we are responsible.

You are expected to comply fully and accurately with all audits, including responding in a timely fashion to requests from or on behalf of auditors, Human Resources, Legal, or senior management for:

- ✓ Documents or other sources of information;
- ✓ Special recordkeeping or retention of documents; and
- ✓ Error reconciliation.

### IMPROPER FINANCIAL RECORDS AND POOR CONTROLS THAT SHOULD BE REPORTED

*A plant engineer submits a CER to management knowing that the justification is not accurate.*

*A plant accountant is instructed by his manager to charge ordinary operating expenses to an inventory account to mask plant cost performance.*

*You should report an individual, at any level of our Company, for instructing or pressuring you to violate our policies including improper recordkeeping and financial performance.*

# BUSINESS CONDUCT

## OUR DUTY TO SPEAK UP

Our Code of Conduct is a guide to help us understand what constitutes ethical behavior. Our Code is not intended to address the ethics of every potential situation, so there are multiple ways to seek additional guidance to understand our personal responsibility to comply with this Code, all applicable laws, rules, and regulations. If you are ever in doubt about the right thing to do, contact your manager, Human Resources, Legal or a trusted fellow associate who is in a position of influence and expertise with respect to the question or suspected violation for guidance.

We all have a duty to report any suspected violation of our Code, policies, or applicable laws. Suspected violations should be reported to a manager, Human Resources, Legal or a trusted associate. If circumstances prevent you from reporting an issue directly, you can make an online report via the Milliken Ethics Helpline (<https://mll.kn/SpeakUp> or by calling 1-866-327-8419 (see [dialing instructions from outside the United States online](#)) where you will be able to speak with a compliance agent who is not affiliated with Milliken.

Our Board of Directors must communicate any violations of this Code promptly to the Chair of the Board of Directors or the Chair of the Audit Committee. These reports can be made anonymously if permitted by local law.

All reports will be treated confidentially, taken seriously, and investigated. We have a strict [Non-Retaliation Policy](#). Retaliation or other types of intimidation against anyone reporting a suspected violation of our Code or applicable law is prohibited regardless of whether the allegation is proven to be true.

## ANNUAL COMMITMENT TO OUR CODE

We are required to sign an annual statement acknowledging that we have read and understand our Code of Conduct. Each year, we agree to be in full compliance with our Code and affirm our obligation to report suspected violations.

## CODE ACKNOWLEDGEMENT

1. I have carefully read and understand our Code of Conduct. I understand my responsibility to live by our Code, as we strive to make a positive impact on the world.
2. I understand that our policies can be found on the Policy Hub on Milliken Connect or by asking an associate on the Human Resources team.
3. I understand that violations of our Code of Conduct or Milliken’s policies may result in disciplinary action.
4. I will complete all required training on ethics and compliance on time.
5. I am not aware of any present or past circumstances of a personal or family nature that would conflict or appear to conflict with the interests of Milliken.
6. I understand I have a duty to report any suspected violation of our Code, policies or applicable laws. I understand that Milliken has a strict non-retaliation policy. I understand that no one will be retaliated against or punished for reporting suspected ethical or legal violations.

\_\_\_\_\_  
Name (please print)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

*Nothing in this Code changes your employment status (i.e., at-will employment where applicable). In the event that anything in our Code of Conduct or our policies contradict applicable law or regulation, the latter prevails*



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MILLIKEN™

# CODE OF CONDUCT

For more information contact the Milliken Ethics Helpline <https://mll.kn/SpeakUp>

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Last updated May 2025

*This Milliken Code of Conduct supersedes and replaces the previous Code of Conduct (last updated in 2024).*

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