



Altro Floors and Walls Supplier Code of Conduct

Our Purpose

Formed in 1919, Altro has been a vibrant and innovative business for over 100 years. Today, our focus is on the floor and wall coverings industry. Working closely with architects, end users, engineers, designers and contractors around the world; our insight and expertise helps them transform everyday spaces into environments that can improve the wellbeing of everyone that uses them.

With offices across Europe, the Americas, Asia Pacific, and the Middle East, we are committed to developing solutions which stand the test of time while using environmentally sustainable materials.

Altro is aware of its responsibilities towards our customers, employees, suppliers, and other stakeholders. This Supplier Code of Conduct defines, and sets out, the general principles and requirements for successful collaboration with our suppliers and business partners.

Our focus is to contribute towards the UN Sustainable Development Goals. This ensures that we prioritise actions and interventions where we can make a positive contribution, as well as minimising our impacts on the environment. We particularly focus on 11 of 17 of these Goals



Altro upholds high standards of integrity and sustainability and will not accept any unethical business behaviour. These standards are also expected of our suppliers. Therefore, suppliers must use their best endeavours to ensure compliance with all applicable laws and regulations, the requirements detailed in this Supplier Code of Conduct and our mutually agreed contractual obligations. At the same time, we encourage our suppliers to ensure their suppliers and their extended supply chain also meet such expectations.

Altro Zero Harm Policy

Altro has a Zero Harm policy which is a fundamental principle of our business. Our employees are empowered to challenge the status quo, take ownership and responsibility, to put safety first in everything that we do.

Our Zero Harm culture is a benchmark for other companies. Altro expects its suppliers to adopt such high standards in all areas of employee health and safety.



As a minimum a supplier must:

- Comply with all applicable health and safety law, regulations and standards
- Provide a safe and healthy place to work and take appropriate action to prevent occupational illness and work-related accidents
- Appoint a competent person to take responsibility for all health and safety and environmental improvements
- Give sufficient training to all employees to carry out their duties safely and issue the required Personal Protective Equipment and Workwear free of charge

Sustainability

Altro's sustainability policy is a key strategic driver to the success of our business and we expect our suppliers to positively contribute to this goal.

As a minimum suppliers must comply with all current environmental laws and regulations and develop measures to prevent environmental pollution.

Suppliers should, wherever possible, support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility e.g. carbon emissions reduction, energy efficiency, climate protection, biodiversity, responsible use of water and implement an appropriate environmental management system.

Bribery and corruption

Our anti-bribery policy is communicated to all our customers, suppliers, and staff to ensure that we are carrying out business in an honest, objective, and fair manner. Our expectation is that our suppliers refrain from such activity.

Material Compliance

Regarding the prohibition and restriction of substances, including hazardous substances and "conflict minerals", Altro ensures compliance with all regulatory and customer requirements in the manufacture and supply of its products. Our expectation is that our suppliers ensure that Altro remain compliant with all requirements which are published in all applicable regulations on a local and international level.

Communication

The Supplier should take appropriate steps to ensure that the principles of this Code are communicated to their employees and throughout their own supply chains. The Supplier should also take appropriate steps to ensure that the principles of this Code are adopted and applied by their employees, suppliers, agents, and contractors to the extent that it is reasonable so to do.

Ethical Trading and Transparency

At Altro, we share the Ethical Trading Initiatives vision of a world where all workers are free from exploitation and discrimination, and work in conditions of freedom, security, and equity.

Suppliers should abide by the following ethical standards and guidelines:

- At a minimum obey all relevant laws
- Treat each other fairly, with dignity and respect
- Prepare all records of financial transactions carefully and accurately
- Report financial conditions and results of operations, honestly and promptly
- Deal honestly and fairly with clients, customers, suppliers, and financial partners
- Avoid actual and potential conflicts of interest
- Avoid the improper giving and receiving of gifts
- Avoid behaviour or activities which would bring their own or Altro's reputation into disrepute
- Report observed violations of legal and ethical standards

In addition to the generally recognised principles above, Altro expects its suppliers to:

- provide transparency in their operations
- accept unannounced audit visits from Altro or their representatives at their sites and those in their supply chain, should Altro deem it necessary
- inform Altro of any non-compliance issues raised by regular audits and inspections and notify Altro of the timetable to rectify such issues to return to full compliance

Working Practices and Human Rights

As a minimum Altro expects its suppliers to comply with all applicable local laws, regulations and collective agreements with regards to working hours and days of rest, conditions, wages and salaries, freedom of association.

Our expectation is that employees are treated equally and fairly.

In particular a supplier shall;

- not employ anyone under the age of 16, under the age for completing compulsory education, or under the legal minimum working age for employment— whichever is higher
- ensure employment contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers and comply with local regulations
- ensure that employees are compensated according to the law including minimum wage, overtime, and where applicable, any premium pay.
- The Supplier shall ensure that employees receive equal pay for equal work without discrimination (see Discrimination & Harassment below).
- allow employees to have the freedom to accept or leave a job voluntarily.
- not require employees to lodge "deposits" or their identity papers with their employer and are free to leave their employment after reasonable notice.

Discrimination & Harassment

Altro believes that, without exception, everyone should be treated with dignity.

Suppliers must not engage in any unlawful discriminatory or harassing conduct in their workplace or on any Altro sites.

Discrimination or harassment based on disability, life threatening disease, sexual orientation, gender reassignment, pregnancy and maternity, religion or belief, race (including ethnic origin, colour, citizenship, nationality, and national origin), marital and civil partnership status, age and gender or any other status is strictly prohibited.

Suppliers shall not inflict or threaten to inflict corporal punishment or any other forms of physical, sexual, psychological, or verbal abuse or harassment on any employees.

Suppliers shall ensure that policies, systems, and procedures are in place to ensure compliance with all sections of this Code of Conduct and appropriate and regular training is given to relevant management and employees on these subjects.

Modern Slavery

We are committed to preventing slavery and human trafficking occurring in any of our corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

The topic of modern slavery continues to be an important theme for Altro and we strive to increase awareness of this issue, both internally and externally. Our expectation is that our suppliers refrain from such activity.

Our Modern Slavery Statement is available via the homepage of our website.

Cyber Security & Data Privacy

It is essential that suppliers safeguard the integrity and security of their systems and comply with the relevant Government standards and guidance. Suppliers must inform the relevant authorities if they become aware of any cyber security incident that affects or has the potential to affect data.

Suppliers must comply with applicable privacy and data protections laws and regulations in the respective countries of operation, as well as secure Altro’s data (including but not limited to any individual personal data which may be available to a Supplier) and Altro’s confidential information and prohibit unauthorized access or use to any Altro data or information.

Where GDPR is applicable, suppliers must comply with current data protection laws and regulations. Personal data of customers, consumers and employees are to be handled confidentially. Supplier must protect confidential information, only use it in an appropriate manner and not disclose confidential or personal data or information which is not publicly available.

Please sign below that you acknowledge receipt of this Altro Supplier Code of Conduct and agree to comply with its content and keep management records to prove such

Signed on behalf of: (Company)

Signature: Title:

Name: Date:
(in capitals)