



## Policy for the Prevention of Corruption

**“At Tarkett, we are committed to conducting business with the utmost integrity and full transparency; we will not tolerate any form of bribery or corruption.”**

La Tarkett S.p.A. rejects and contrasts, any form of corruption in the broadest sense of the term, such as "abuse of power for private purposes" and as practices of malfeasance integrated with promise, induction, instigation, request, offer of incentives or various benefits as a reward to a person to act or omit actions, whether due or not due, regardless of whether or not they accept the promise or offer.

The culture of legality is at the base of the Company's way of doing business, it is for this reason that the necessary conformity to the current legislation is constantly affirmed and the need to ensure conditions of correctness and transparency in the conduct of business and in the protection of corporate activities, of your position and image, of the work of your employees and customer activities.

This **Policy** helps to increase general compliance with international laws and good practices and, in order to concretely implement the culture of legality, to prevent and combat corruption, Tarkett S.p.A. has already strengthened its own control system by adopting and updating the organization, management and control model pursuant to **Legislative Decree 231/2001**, acquiring a management system for corruption prevention compliant with the **UNI ISO 37001: 2016** Standard and the **Tarkett AntiCorruption Code of Conduct**.

Each subject carries out activities on behalf of the Company is required to read and understand the contents of this Corruption Prevention Policy (available in every work area) and to behave in accordance with what it has established, the laws and regulations.

This Policy for the Prevention of Corruption by Tarkett S.p.A. aims to achieve the following objectives:

- Prohibit corruption and ensure the achievement of higher compliance with national and international regulatory standards on anti-corruption.
- Ensure the sustainability, honesty and transparency of the *business* by countering any malpractice phenomenon.
- Contribute to spreading the culture of doing business by supporting loyalty, integrity, honesty, competition and transparency as a fundamental element of the work.
- Promote and develop ethics in economic relations to protect the market, combating all forms of illegality.
- Adopt the management system for the prevention of corruption as a tool to effectively combat corruption, requiring a continuous commitment and *leadership* of the Management and strengthening the control system at every level of the Organization.
- Develop and nurture awareness of the commitment to the prevention and fight against corruption of all *stakeholders*.
- Create a system of controls, easily known and understandable, that can be implemented and monitored to guarantee the effectiveness and efficiency of the preventive control function.
- Encourage the reporting of any suspicion of attempted corruptive act, certainly, presumed through dedicated channels and methods which, while still respecting the protection of the reputation and image of the Company, allow, on the one hand, to carry out investigations and investigations in order to assess their validity and to prepare effective measures of contrast and, secondly, to guarantee the informant protection from any form of retaliation.

Tarkett S.p.A. stigmatizes, condemns and in any case refuses corruption and instigation to corruption and prohibits its commission, whether active or passive, direct or indirect, of public officials or public service appointees or between private subjects, both national and international, and undertakes to oppose it, in compliance with national legislation, with international conventions and guidelines and with *Best Practices*. This preventive intent is shared with the Central Group of the Multinational that supports the Italian site with organizational tools capable of making the prevention and the fight against corruption phenomena effective and feasible.

The Company involves **top management** in the prevention of corruption by its collaborators, makes it a promoter of a culture in which corruption is not acceptable and requires a strong and visible commitment to supervise compliance with anti-corruption measures, ethics, on the performance of internal controls, as well as the implementation of all the measures deemed appropriate for the prevention, identification and reporting of potential violations. The Company recognizes as necessary a *due diligence* on its *stakeholders* in order to reduce the risk of corruption, with deeper levels so much greater as the potential crime risk is.

Tarkett S.p.A. establishes and appoints a specific **Compliance Function for the Prevention of Corruption** equipped with autonomous powers and resources with the task of supervising, guaranteeing the implementation and functioning of the management system for the prevention of corruption. To this Compliance function is assigned specific powers, faculties and functions for the effective fulfillment of his role. The Compliance Function for Corruption Prevention supervises the design and implementation of the management system. This function will be able to access all documents of the company.

The Company encourages, in line with the *Whistleblowing* Policy, the **Reporting** of any suspicion of a corrupt act, attempted, certainly, presumed, as well as any alleged or claimed violation of this Policy as well as its Anti-corruption Code of Conduct and management system for the corruption prevention. The Company has provided specific **reporting** channels which, more generally, are reserved for reporting alleged violations of professional conduct rules and/or ethical principles, referred to the applicable internal and external regulations, and/or unlawful or fraudulent conduct that can be reported to employees, members of the corporate bodies, group companies and third parties (clients, suppliers, consultants, collaborators), who can determine, directly or indirectly, economic-asset and/or image damage. The report must provide all the information needed to carry out the checks and assessments necessary to assess the validity of the same: it must clearly and completely describe the space-time circumstances of the event, general information or other elements that allow identifying who committed the crime reported act, or any other subjects that can report on the facts of reporting, indicate/provide any supporting documents. The report can be made through two main channels:

- 1) By mail: by sending the report to the address: [Odv.it@tarkett.com](mailto:Odv.it@tarkett.com).
- 2) By paper: by filling in a specific form available (on the site in the "Anti-corruption Board") and after delivery in the **boxes present on the site**.

In the case of the suspect in good faith or of the person reporting on the basis of reasonable or confidential convictions, no form of retaliation or discrimination having effects on the working conditions is permitted for reasons connected to the complaint, meaning by discriminatory measures any unjustified disciplinary action harassment in the workplace and any other form of retaliation that leads to intolerable working conditions.

In the same way, however, it must be emphasized that any form of abuse of the report, such as, by way of example, the will to defame or slander, improper use or intentional exploitation of the institute object of this Policy, is strictly prohibited. The Company reserves the right to pursue an obviously distorted use of this instrument, considering how the abuse of the reporting system significantly undermines the entire management system.

The commission of **acts in violation** of the Anti-Corruption Policy, as well as, more generally, the violation of the rules on the prevention management system and the abuse in the reporting activities, constitutes non-fulfillment of the contractual obligations and the respect of the company rules, and gives course to the imposition of **sanctions** as provided for in the company system as well as penal and civil consequences. For the Tarkett employee the sanctioning system already envisaged in the model MOD 231 and for external personnel as already provided for in the contract (from the block of payments until the immediate termination of the contract).

Tarkett S.p.A. establishes and implements specific **Training** plans aimed at its Staff regarding the commitment to the prevention of corruption, the policy, the procedures, the protocols and other anti-corruption tools, the international and national anti-corruption legislation and the legislation concerning the broader prevention of crime risk (Legislative Decree 231/2001), and aimed at ensuring its dissemination and correct understanding.

**Tarkett S.p.A. undertakes to do everything possible to ensure the dissemination, adoption and implementation of this anti-corruption policy among all stakeholders, to monitor and control their application, providing for a system of sanctions for the related violations, and to take care of their constant update. It also commits itself to the fight against corruption also publicly, to promote and spread the culture of legality and the fight against corruption, also through the dissemination of the document by publication on its website.**

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