



## CODE OF BUSINESS CONDUCT

### OUR VISION

*“To create exceptional products that shape the future, improve lives, strengthen communities, and inspire enduring memories.”*

AHF’s ultimate goal is to positively impact our employees, our customers, and our industry by creating beautiful flooring products. We seek to make products that not only inspire, but that have the durability and strength to last for generations. With decades of experience in award-winning wood flooring design, innovation, product development, manufacturing and service, we strive to improve the quality of people’s lives through great products and a deep commitment to outstanding customer service.

### OUR MISSION

*“We create exceptional products and services that enable AHF and our channel partners to grow profitably as their preferred supplier.”*

From concept to construction, design to delivery, our product leadership is rooted in pioneering discoveries, superior capabilities, and continuous improvement. By staying ahead of advances in science, engineering, and manufacturing, we are empowered to deliver innovative and original designs, constructions, and performance technologies.

AHF is a leader in hardwood and resilient flooring with a family of strong brands serving the residential and commercial markets. Our flooring brands are some of the best-known in the industry, including Bruce®, Hartco®, LM Flooring®, Robbins®, HomerWood®, Capella®, tmbr™, Parterre®, Raintree®, Armstrong Flooring™, Crossville® – and we intend to keep growing!

AHF is headquartered in Mountville, Pennsylvania, USA, with manufacturing operations across the United States and in Cambodia.

### OUR CORE VALUES

At AHF, we are strong because our values are T.O.U.G.H.:

**T**ransparency- Real listening, open communication and straight talk.

**O**wnership- Empowering excellence through creativity, accountability and decisiveness.

**U**nity- A common vision supported through collaboration and genuine care for one another.

**G**rit- Embracing risk, committing the courage and resolve to drive great results and outcomes.

**H**ustle- Working hard with speed and agility to out-pace the competition.

Our core values demonstrate we are honest, trustworthy, credible, and play by the rules. These values shape AHF’s policies and procedures, which provide direction and guidance in our day-to-day business dealings.

## Transparency



At AHF, business is personal. With a solid belief in the power of teamwork, confidence, and trust, we consider our employees, as well as the contractors, vendors, suppliers, and business partners with whom we do business (collectively, our “partners”) true partners. We pledge to deliver reliable, consistent, best-in-class products, support, and services and to be fair, honest, and dependable in all our professional dealings.

Our success hinges on our ability to build and maintain credibility and trust with all of our stakeholders. We recognize we gain this credibility by being transparent, honoring our commitments, exhibiting integrity, and reaching our company goals through honorable conduct. Actions speak louder than words, and at AHF, we not only talk about transparency, but we demonstrate it through our open communication and straight talk.

## Ownership

We realize success depends on our ability to stay on the cutting-edge of a rapidly evolving market by making sound decisions quickly. In order to stay competitive, we empower our employees to be creative decision makers and providing an inventor incentive for great ideas! **GP-70.F, Inventor Incentive**. Ownership means our employees recognize the need to be decisive in their decisions, creative in their solutions, honest in their dealings, and accountable for their decisions and commitments.

We all benefit when employees and partners exercise their power to prevent mistakes or wrongdoing by asking questions. At AHF, everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. We empower our managers to create open and supportive environments where employees and our partners feel comfortable raising questions and concerns, have pride in and own their accomplishments, take responsibility for and own their mistakes, and are given the ability to correct errors or ask for help when needed.



We will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. At AHF, we have **zero tolerance** for inappropriate behavior and will not tolerate retaliation against employees or our partners who raise genuine ethics concerns in good faith. **HR Policy HR-40**.

Employees and partners are encouraged to address any issues with a managers or HR, as we believe most problems can be resolved swiftly with open communication. If for any reason that is not possible or if an employee or partner is not comfortable raising the issue with management or HR, they can **make a report using the Company’s confidential ethics line at [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) or by calling 866-220-0006 (USA and Canada); 800-216-1288 (Spanish-speaking USA and Canada); 855-725-0002 (French-speaking Canada); or 01-800-681-5340 (Spanish-speaking Mexico)**.

Ownership also means we strive for the highest ethical standards in our business relationships. Our management and leadership teams are responsible for clearly communicating behavioral expectations as well as leading those expectations by example. Managers are therefore not only expected to hold themselves to the highest ethical standards, but they are also responsible for addressing any ethical questions or concerns raised by their employees or our partners. Management is also tasked with the

responsibility to take the necessary steps to address such ethical matters that they may encounter in the workplace. Ultimately, our actions are what matters as we lead by example, and how we chose to act, is of the utmost importance in maintaining the success and integrity of AHF.

## Unity

We know in order to be successful our employees and partners need to be working together towards a common vision, and we cannot afford to let anyone's talents go unrecognized.



AHF is therefore committed to creating an environment of collaboration and care, where everyone is treated with dignity and respect. By doing so, we are embracing the full potential in each of us, which, in turn, contributes directly to our business success in recognizing our vision and meeting (and exceeding) our goals.

**AHF is an equal opportunity employer and is committed to providing a workplace that is free of discrimination and all types from abusive and/or harassing behavior.**

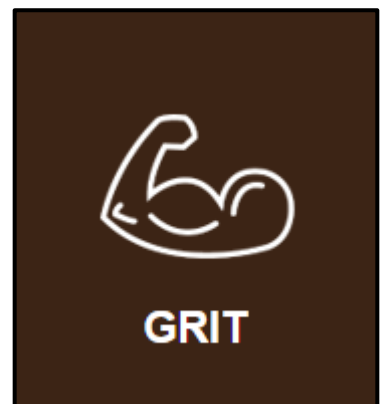
Any employee, partner, or customer who feels harassed or discriminated against should report the incident to his or her manager, their AHF representative, to the AHF human resources team, or through the Company's confidential ethics line at [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) or by calling 866-220-0006 (USA and Canada); 800-216-1288 (Spanish-speaking USA and Canada); 855-725-0002 (French-speaking Canada); or 01-800-681-5340 (Spanish-speaking Mexico). *GP-20.C Reporting Concerns or Compliance Issues; HR Policy HR-40.*

## Grit

At AHF, we must have the courage to tackle the tough decisions and make difficult choices secure in the knowledge that AHF is committed to doing the right thing. Grit means doing more than what the law requires.

Although AHF's core values and guiding principles cannot address every concern or provide answers to every issue, they can define the spirit in which we intend to do business and should guide us in our daily conduct. We empower our employees and stakeholders to embrace risk; without it, there is no reward. We are committed to having the courage and resolve to drive great results and outcomes.

We know that part of embracing risks is also a commitment to integrity, which begins with complying with laws, rules, and regulations where we do business. We will never let our drive for success impinge upon our responsibility to uphold the law. Each of us must have an understanding of the Company's policies and procedures, as well as the laws, rules and regulations that apply to our industry and specific roles. If we are unsure of whether a contemplated action is permitted by law or AHF policy, we should seek the advice from the content expert or legal team. We understand that part of true grit is being responsible, preventing legal infractions, and having the courage to speak up if we see possible violations.

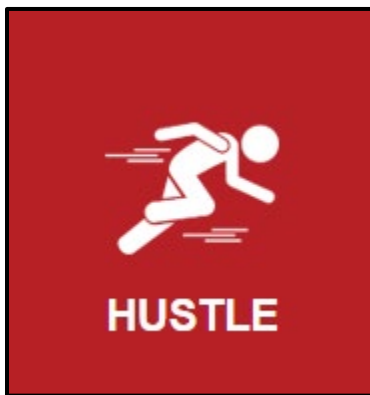


Our supply chain management system embodies our grit. Through our SCM program, AHF can assess the risks of doing business with vendors around the globe, enabling us to make the best decisions regarding our supply chain. Additionally, the system helps ensure compliance with laws such as the Lacey Act, CARB/TSCA, and the UFLPA, just to name a few, and allows us to review a product's origin to make certain it meets governmental and societal standards of good and fair dealing.

Questions about laws or regulations that govern our products or about compliance in general should be directed the Legal Team.

## Hustle

Anyone who has spent any time at all talking with AHF's CEO, Brian Carson, knows one of his core beliefs is that we need to "out-hustle" the competition. His commitment to hard work empowers the entire AHF team to work with the speed and agility needed to out-pace the competition.



And although AHF is deeply committed to fair and vigorous competition, our hustle never gets in the way of our ethics. We know that no matter how hard we work and no matter how much we hustle, ethical behavior must remain at the heart of every transaction in order to gain the trust and loyalty of not only our employees, partners, and customers, but of our competitors as well. AHF will therefore sell our products based on their beauty, durability, quality, and competitive pricing. To this point, AHF is committed to open markets, fair business practices, and conducting business activities in accordance with all applicable Antitrust and competition laws and regulations. We will never allow our hustle to outweigh our commitment to upholding the law and doing what is right. **GP 70.B Antitrust Policy.**

## AHF'S COMMITMENT TO SAFETY AND RESPECT

In addition to fulfilling our vision, living our mission, and embodying our core values, AHF understands our success is founded on two key guiding principles: a commitment to safety and a promise of respect – respect for our partners, respect for ourselves, and respect for our environment.

### Safety

At AHF, safety is a foundational commitment that is never to be compromised. We believe that each member of our team is personally accountable for safety – from employees who practice care and caution to safeguard themselves and others, to the managers who are responsible for the safety of their teams, to company leaders who ensure that employees have the tools and training they need to work safely, as well as our partners as they provide goods and services.

Safety is integrated into our culture and our business every day through the following key elements:

- Management leadership
- Commitment to personal accountability
- Risk management and elimination
- Performance improvement through world-class safety and health systems.

Through continuous improvement we identify, assess, and control safety risks because we believe:

- Injuries and occupational illnesses are preventable;
- Operating exposures can be reasonably safeguarded;
- Safety adds value for AHF employees, partners, and customers; and
- Management is responsible for providing a safe workplace.

We know safety must be a cornerstone of our business and are committed to safeguarding employees and partners from the potential hazards of our operations, providing safe products for our customers, and complying with applicable laws and regulations worldwide relating to health and workplace and product safety. Based on proven principles, we are confident that our safety management systems empower our employees and partners to strive for the highest level of safety performance.

AHF and its employees and partners must comply with all applicable health and safety laws and regulations. Each AHF facility is required to be knowledgeable of and promote compliance with applicable laws and regulations. Management implements and oversees appropriate health and safety standards for each facility that are designed to provide a safe working environment and ensure that you are given the knowledge and skills to do your job safely. ***GP 30-A Safety.***

We also believe all employees and partners have the right to work in an environment free from all forms of threats or acts of violence. AHF therefore strictly prohibits all forms of workplace violence, and any such actions will not be tolerated. ***GP 30-B Workplace Violence Policy.***

### **Respect for our Customers and Respect for Ourselves**

In most situations, being respectful means doing the right thing; and doing the right thing ultimately involves taking a lawful and ethical course of action. The respect we have for our customers, partners, and ourselves is fundamentally about upholding the law and our ethics to ensure our business and business relationships can continue to grow.

### ***Quality***

At AHF, we are committed to delivering exceptional quality in every aspect of our operations. Our dedication to quality is evident in our products and processes ensuring customer satisfaction and a continuous improvement mindset.

We believe that like safety, each team member is responsible for quality in the work they do for the company. We use a “Plan, Do, Check, Act” mindset to drive improvements in the work we do.

### ***Proprietary Information***

In the same manner we expect our customers to respect our property rights, we know it is important for us to respect the property rights of others. We will not improperly acquire or seek to acquire by improper means, a customer’s or competitor’s trade secrets or other proprietary or confidential information. AHF will not engage in infringement of any kind and will not use, copy, distribute, or change the intellectual property of any third party.

### ***Avoiding Conflicts of Interest***

As AHF employees, our non-work related financial, business, and personal activities and interests must be free of actual and potential conflicts with our responsibilities to AHF.

Under the Company's conflicts of interest policy (GP 20-B Conflicts of Interest), Employees cannot:

- Favor friends, relatives, government officials, Business Partners, or any of their firms or employers, over AHF's interests in any AHF business decisions, including, but not limited to, purchasing, contracting, sales, and human resource/management decisions.
- Accept any payment, loan, gift, favor or anything of value from anyone, including Business Partners, which is not allowed by our ***Anti-Corruption and Gifts Policy (GP-20.A)***.
- Hold themselves out as an AHF representative in any non-work related activities.
- Misuse AHF resources or influence or discredit the AHF name.
- Work for themselves or others during their AHF working hours.
- Work for a competitor.
- Work as or for any Business Partner on any work performed for AHF.

Employees must:

- Exercise good judgment in any non-work related personal and business dealings that reflect on AHF.
- Disclose if they have a personal relationship with a Business Partner, government official, or another employee at AHF that may conflict with or appear to conflict with their responsibilities to AHF or with AHF's responsibilities under applicable laws or regulations. This requirement includes, but is not limited to, disclosing and avoiding direct supervision of any employee with whom you have a personal relationship, including friends and relatives.
- Disclose in writing any actual or potential conflict of interest, including relationships, activities, or interests that might influence or be perceived as having an impact on the performance of their duties and responsibilities to AHF.
- Any employee who is unsure whether a situation is appropriate, should make a clear, written disclosure of the material facts to his/her manager and seek guidance and written approval using the AHF Disclosure Form. ***GP 20-B Conflicts of Interest***.

AHF is committed to conducting business in an ethical and responsible manner, and we expect our partners and suppliers to share this commitment. In this spirit, we have established a Supplier Code of Conduct to define the key expectations and standards we have regarding the conduct and operations of our partners. The Supplier Code of Business Conduct is meant to function as a reference during AHF's selection and retention of Suppliers that provide goods or services supporting our operations worldwide. The Expectations and Standards set forth in the *Supplier Code of Conduct* include compliance with laws, as well as a focus on:

- ethical environmental practices;
- occupational health and safety;
- employment and labor standards;
- prevention (disclosure) of conflicts of interest;
- subcontractors and upstream suppliers; and
- monitoring and compliance.

AHF is committed to operating our business in a manner that places people, the environment, and integrity at the forefront. We encourage and expect these same standards to be practiced by all parties with whom we conduct business. ***Governance - Supplier Code of Conduct***.

## **Setting Metrics and Reporting Results Accurately**

### **Corporate Recordkeeping**

We create, retain and dispose of our company records as part of our normal course of business in compliance with all AHF policies and guidelines, as well as all regulatory and legal requirements. **GP 70-E Records Management; GP 70-E Appendix 1 Records Retention Schedule.**

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with AHF's and other applicable accounting principles.

We will cooperate in audits; will not improperly influence, manipulate or mislead any unauthorized audit; and not interfere with any auditor engaged to perform an internal independent audit of AHF's books, records, processes or internal controls.

### **Accountability**

AHF recognizes the importance of having established standards in order to comply with certain laws and regulations. For this purpose, AHF has implemented Company Policies to establish rules that relate to significant issues or risks and create obligations and responsibilities that will be inspected and enforced. In addition, Company Policies act as work procedures, intended as helpful guidelines and recommended practices.

Company Policies operate as an extension of the principles set forth in this Code. Compliance with applicable policies is required by AHF employees and, in some cases, by third parties and partners. AHF's policy management efforts and compliance practices are periodically audited and monitored by the company's Legal and Compliance functions. Any person who is concerned about whether or not the standards are being met or are aware of violations of the Code, must contact the HR department or the Company's confidential ethics line. AHF takes seriously the standards set forth in this Code and its Policies, and violations are cause for disciplinary action up to and including termination of employment. **GP-01.A AHF Policies and Policy Management.**

## **Confidential and Proprietary Information**

In order to maintain its competitiveness in the industry and protect its research and development investment, AHF must adequately protect its Confidential Information and Trade Secrets from improper disclosure. In addition, the Company must also protect from improper disclosure of any Confidential Information and Trade Secrets that the Company receives from its partners, as well as confidential and protected information entrusted to us by our employees.

Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. AHF will not disclose confidential and nonpublic information without a valid business purpose, legal reason, and/or proper authorization. **Legal-100 Trade Secret Policy.**

All confidential information must be appropriately marked and housed as such to prevent inadvertent disclosure or misuse. **GP-60.B Information Sensitivity.**

## ***Use of Company Resources***

Company resources, including time, material, equipment, and information, are provided for company business use. Nonetheless, we understand personal needs can arise during the workday. Limited, occasional, and incidental personal use of company resources is permissible as long as it does not interfere with the employee's work duties or job performance, does not cause a disruption to the workplace, is of no/de minimis cost, and does not conflict with other AHF policies.

Employees, partners, and those who represent AHF are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Neither Company equipment (computers, copiers, etc.), nor company time should be used to conduct outside business or in support of any religious, political, or other outside daily activity, except for company-requested support to nonprofit organizations. Neither employees nor partners should solicit contributions nor distribute non-work related or non-approved materials during work hours. ***GP 20-B Conflicts of Interest.***

Electronic communications and files stored, transmitted, or transferred on AHFIT network infrastructure are the property of AHF. AHF reserves the right to monitor, access, audit, review, delete, disclose, or use all data and information contained on an employee's or partner's company-issued computer or electronic device or AHF's intranet/employee site(s), as well as use of the Internet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate. ***IT-001 Information Technology Data Classification and Handling Policy; IT-002 Information Technology Acceptable Use Policy.***

Questions about the proper use of company resources should be directed to your manager or Company contact.

## ***Fair Employment and Labor***

AHF is committed to fair, equitable, and legal employment practices. We do not use nor condone the use of forced labor, nor do we employ any contractor that utilizes such employment. We also do not use or condone the use of child labor that does not meet U.S. federal, state, or local laws and regulations allowing for the employment of minors, nor do we employ any contractor that utilizes such employment. In addition, AHF recognizes its employees' right to freedom of association and the right to form, join, assist or support as well as refrain from forming, joining, assisting or supporting unionization. AHF will not retaliate against employees for exercising their protected right to express their views on unionization or for otherwise engaging in union activity.

## **AHF'S COMMITMENT TO AND RESPECT FOR ENVIRONMENT**

As a responsible corporate citizen, AHF is committed to the integration of environmental stewardship into our business decisions. We believe each of our employees and partners should take responsibility and consider the environmental impact of their workplace actions and decisions. AHF is committed to complying with applicable legal requirements and making a positive impact through our environmental management practices.



AHF's manufacturing plants maintain an Environmental Management System (EMS) in accordance with ISO 14001, which include continuous environmental performance targets. We assure the environmental integrity of our processes and facilities by adhering to the following principles:

- Promote environmental stewardship for our workplaces and communities;
- Select and use energy and raw materials responsibly;
- Eliminate waste and embrace recycling and circular economy principles;
- Ensure our products conform to environmental, safety, and quality standards;
- Encourage development and diffusion of environmentally friendly technologies;
- Promote environmental activities in cooperation with Business Partners/Suppliers;
- Continually assess the impacts of our plants and products on the environment and the communities in which we operate with a goal of continuous improvement; and
- Engage stakeholders to identify effective and sustainable solutions to environmental challenges.

All employees and partners are responsible for understanding the impacts of this policy on their day-to-day work practices and are expected to practice and support the principles stated above.

### **DO THE RIGHT THING**

In sum, AHF is committed to doing the right thing... always. We are T.O.U.G.H., when it comes to following our core values, and our actions are driven by our guiding principles of safety and respect.

There are other Policies and procedures that may impact employees and/or partners in their daily work. All employees are therefore encouraged to review the Company Policies, which are located on the Employee SharePoint (the HUB). AHF partners should review our Governance Documents and feel free to ask for any Policies that they believe pertain to them or their work with AHF.

## **RESOURCES AND CONTACT INFORMATION**

### **Media Inquiries**

In order to ensure we provide the most accurate and up-to-date information about AHF, all media inquiries should be directed to **Catherine del Vecchio, Vice President Marketing**, at [catherine.delvecchio@ahfproducts.com](mailto:catherine.delvecchio@ahfproducts.com).

*Media note: No employee or partner is authorized to speak on behalf of AHF or to issue a press release without first consulting with the Chief Counsel or Chief Commercial Officer and the Vice President of Marketing.*

### **AHF Products Headquarters**

3840 Hempland Road  
PO Box 566  
Mountville, PA 17070  
1-866-243-2726

[www.ahfproducts.com](http://www.ahfproducts.com)

### **Chief Executive Officer (CEO)**

Brian Carson

### **Chief Commercial Officer (CCO)**

Jennifer Zimmerman

### **Chief Financial Officer (CFO)**

Brent Emore

### **Chief Human Resource Officer (CHRO)**

Karen Bradley

### **Chief Operations Officer (COO)**

Jake Loftis

### **General Counsel**

Tim Nieman

### **EEO**

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