



ASSOCIATE CODE  
OF CONDUCT

Milliken™

## INTRODUCTION

At Milliken, we believe ethical behavior is the right thing to do as an individual, an organization and a community of associates. As a long-held, core value of our company and our shareholders, it is the foundation of our 150+ year history of business and corporate leadership. Honesty, integrity and ethical behavior are the responsibility of every Milliken associate. We strive to conduct ourselves in accordance with behaviors that reflect respect for our fellow associates, our shareholders, our business partners and the communities in which we live. We believe that ethical behavior is the ultimate example of respect and care for others regardless of their position, place or circumstance.

The Code of Conduct is our guide to ethical business behavior. It cannot address every situation or circumstance, but it can be summarized in one simple idea: “Do what is right.” This requires that we exceed the letter of the law by making informed judgement decisions.

Our commitment to ‘doing what is right’ will ensure our continuing legacy of ethics, excellence and leadership and secure a future of distinction for Milliken & Company.

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## OVERVIEW

Milliken's Code of Conduct ("Code") reflects the alignment of our shareholders, the Board of Directors and management regarding the values, principles and guidelines to which Company associates must adhere in order to meet our expectations regarding honesty, integrity and responsible business behavior. It defines not only how we interact with our customers, suppliers and other business partners, but also how we interact with each other and the communities in which we live. Subject to local law, the Code applies equally to all associates globally.

Detailed policies related to the topics covered in the Code can be found on the Company intranet and in policies and procedures maintained by Company locations or functional areas.

### Your Responsibilities

The role of all Milliken associates begins, but does not end, with understanding the Company's values and this Code. If an ethical or legal compliance issue develops that raises a question in your mind, you have a responsibility to bring it forward. Speak with your supervisor or manager, your Human Resources representative, the Legal Department or a trusted fellow associate who is in a position of influence and expertise with respect to the question or suspected violation. Communicating your concerns directly with the Company is the best way to ensure timely and thorough resolution.

If you do not want to speak directly with a Company representative, Milliken has established the Milliken Ethics Helpline where you can speak to a compliance agent who is not affiliated with Milliken about an actual or suspected violation of this Code, applicable laws or regulations (1-866-327-8419 in the US; other country direct numbers can be found at [values.milliken.com](http://values.milliken.com)). You can make your report anonymously if permitted by local law. All reports will be handled confidentially and investigated appropriately.

Because Milliken wishes to encourage the responsible reporting of potential violations of either the law or this Code, retaliation of any kind against an associate for making such a report in good faith is prohibited regardless of whether the allegation is proven to be true.

## HEALTH & SAFETY

The health and safety of ourselves and our fellow associates is of paramount importance to everyone at Milliken. Our goal is to provide an injury-free workplace for our associates by following strict safety and health rules and practices including:

- Requiring every Company 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;
- 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;
- Prohibiting substance abuse (see Substance-Free Workplace section).

While compliance with all applicable laws, regulations and recordkeeping requirements is mandatory, the Company seeks to surpass the legally required minimums. It is our intent to avoid any injuries and to continue being recognized as a global leader in safety.

### EXAMPLES OF UNSAFE BEHAVIOR

*Mary, a plant engineer, tells Fred that the electric safety interlock on a machine is not working properly, so he should be "extra careful" while working around this machine.*

*Joe decides not to follow proper lock-out/tag-out procedures for machinery maintenance. He says, "It takes too long and I'm always careful."*



## ENVIRONMENT

Milliken strives to operate in an environmentally-conscious manner through waste reduction, pollution prevention and the efficient use of non-renewable resources. We operate our plants and facilities in compliance with applicable environmental laws and regulations as a minimum requirement. We go beyond compliance by setting targets to reduce our energy consumption, greenhouse gas emissions and water usage. We seek to reduce, reuse or recycle our wastes to the extent economically feasible. We are vigilant to ensure that all practices, metrics and protocols are contemporary, relevant and visible to all stakeholders.

All Milliken associates are expected to conduct themselves in accordance with this policy and with applicable environmental laws and regulations.

### EXAMPLES OF IMPROPER BEHAVIOR RELATED TO THE ENVIRONMENT

*Patty, a process engineer, instructs her associates to dump used machine oil down a drain in one of the laboratories in order to save on recycling costs.*

*Al, the plant manager, tells the contractor responsible for the removal of organic waste material, "Just don't tell me what you do with this stuff."*

*Boris, the department manager, directs his operators to leave a range running for several hours while waiting for fabric in order to avoid a start-up.*

## FAIR TREATMENT

As a company, we expect all associates to treat one another with courtesy, dignity and respect. Each associate contributes to making Milliken a successful company and a fulfilling place to work. Our values are richly embedded in this commitment and are backed by our philosophy as outlined in this Code.

Equal opportunity and fair treatment extend to all associates. The Company specifically prohibits discrimination on the basis of age, disability, ethnicity, national origin, race, color, religion, gender, military or veteran status, genetic information, sexual orientation or any other characteristic protected by law. Decisions related to any aspect of employment are to be based on the individual applicant's or associate's qualifications as they relate to the particular job.

In addition to complying with U.S. Equal Employment Opportunity (EEO) laws, the Company must comply with all other civil rights, human rights and labor laws around the world where legally applicable. The Company strictly prohibits the use of child labor or involuntary labor in our own operations or those of our suppliers.

The Company is committed to providing an environment that values diversity with a conscious desire to achieve understanding, respect, inclusion and continuous learning.

### EXAMPLES OF UNFAIR TREATMENT

*Ann, an ethnic minority associate, is told that her manager will need to be with her while she communicates process changes to other associates since they might not "understand her."*

*Harvey develops a marketing campaign for a customer. His manager explains that he will present it to the customer without Harvey because it was felt that the customer would be more comfortable with someone who is not in a wheelchair, and his manager "assumed" Harvey wouldn't want to make the trip.*

## HARASSMENT-FREE WORKPLACE

Promoting teamwork and excellence demands a working environment that is free from discrimination, harassment, bullying or other intimidating personal behavior. All Milliken facilities worldwide must maintain a professional and harassment-free working environment. They are places where associates 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, gender, age, nationality, disability, 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.

In addition to covering all associates, Milliken’s harassment-free workplace policy extends to outside vendors, customers, professionals and other providers of goods or services to any Milliken location worldwide. This policy applies to both work-related settings, electronic communications and company-organized activities outside of the workplace.

### EXAMPLES OF HARASSMENT

*Billy has a habit of telling offensive jokes – sex jokes, racial jokes, denigrating jokes – about everyone. He has sent them inside and outside the Company using the company e-mail system.*

*The entire team is aware that Tom is of a particular ethnic background, but when Mark is assigned to work with Tom, he tells his supervisor that he wants to be reassigned because he is just not comfortable around Tom. His manager complies with Mark’s request.*

## SUBSTANCE-FREE WORKPLACE

Milliken understands that substance abuse – whether alcohol or drug abuse – has an adverse effect upon our goal to maintain a safe and injury-free workplace. The Company has a drug and alcohol-free workplace policy that extends to locations worldwide and applies to associates, vendors, customers and guests. Our substance-free workplace policy prohibits:

- Being under the influence of alcohol, illegal drugs or any other controlled substance on the job;
- 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.

### 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.

### EXAMPLES OF SUBSTANCE ABUSE IN THE WORKPLACE

*Carla, a sales representative, frequently entertains customers at lunch. She regularly has two or three drinks and returns to work with a little “buzz”.*

*Claudia takes double the physician prescribed amount of a muscle relaxant just to get through the “tough times”.*

*Leonard, on occasion, takes amphetamines to stay alert on the job.*

*Joe becomes aware of associates in his facility who frequently arrive at work under the influence of drugs, but he fails to report this behavior to Human Resources.*

## CONFLICTS OF INTEREST

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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 judgment on behalf of the Company, influence your actions or lead you to neglect Milliken’s business interests. It is our policy that associates are expected to avoid any actual or apparent conflict of interest between their personal interests and the interests of the Company.

### Avoiding Conflicts of Interest

The potential for conflicts of interest does not end when you leave the office. As a Milliken associate, you are expected to manage all of your business relationships with your Company responsibilities in mind. Even outside the office, you 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. Such situations might include:

- 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 numbers 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 the Company to such an extent that it distracts from your job at Milliken; and
- 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).

If you have a situation that could be a conflict of interest, see the policy manual for instructions regarding how it should be handled. If a conflict of interest can be managed, the Company will work with you to determine the appropriate course of action.

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

*Nigel is an associate whose sister operates a vending machine company. He learns that his plant will soon be choosing a new vending service. After bids have been received from prospective suppliers, Nigel gives his sister the terms of the best proposal received so far. His sister then submits a slightly better proposal on behalf of her company.*

*Maria, a supervisor, is responsible for filling an open position in her department. Maria’s cousin is well qualified and looking for a job. Instead of turning the hiring decision over to her manager, Maria hires her cousin to report directly to her.*



## BUSINESS GIFTS & ENTERTAINMENT

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The giving and receiving of gifts and entertainment are courtesies designed to build goodwill between companies. They foster positive working relationships between our Company 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, or are of substantial value.

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.

### Policy

Gifts and entertainment accepted or provided must:

- Have a legitimate business purpose;
- Be consistent with Company values and policies;
- Be infrequent, in good taste, of nominal value (less than US\$100 or equivalent), and unsolicited;
- Comply with laws and regulations;
- Not be given as a bribe, payoff, or kickback;
- Not knowingly conflict with the policies of the receiver;
- Not be in the form of cash or cash equivalents (i.e., gift cards);
- Not embarrass you or the Company if they were publicly disclosed;
- Not create a feeling of obligation, compromise your judgment, or appear to inappropriately influence you or the recipient; and
- Be discussed with and approved by your supervisor 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 approval requirements as described in the Business Gift & Entertainment policy.

If you are unsure of the reasonableness or appropriateness of, or whether you can attend, a particular meal or entertainment event, you should consult with your supervisor and, if appropriate, your division CFO, Regional Finance Leader, or the Company's Corporate Controller.

### Gifts, Meals, and Entertainment Involving Public Officials

The sale of goods and services to most governments or into their supply chains is heavily regulated. Associates involved in sales to governmental customers or their supply chains 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 the Legal Department before making any offer of gifts or entertainment to any public official or their supply chains.

#### EXAMPLES OF IMPROPER BUSINESS GIFTS & ENTERTAINMENT

*Steve, a business manager, requires major suppliers to take him on hunting trips throughout the year.*

*A supplier bidding on a contract offers Yuji, the project manager, a fee to provide him with the amount of the lowest bid he has received so far.*

*Anton is negotiating the terms of a contract with a senior government procurement official. He offers the official a gift of a wristwatch and invites her to play golf at an exclusive club.*

## FRAUD

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

It is important for us to understand what fraud can entail 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 or non-conforming;
- Making an entry on Company records or financial statements that is known to be inaccurate or not in accordance with proper accounting standards or Company guidelines;
- The inappropriate destruction or alternation of Company records (for more information on Company records, see Recordkeeping, Financial and Accounting Controls); and
- Improper or unlawful conduct with respect to trade.

### EXAMPLES OF FRAUDULENT BEHAVIOR

*Jordan's customer takes him out for dinner after he makes a sales presentation. Jordan then expenses the same \$65 dinner on his expense report.*

*Sophia, a 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, Gerard knowingly misrepresents the attributes of the Company's product.*

## ANTITRUST & ANTI-COMPETITIVE BEHAVIOR

Milliken is committed to fair and honest competition. All associates, but especially those working in marketing, sales, sourcing or business management, must understand and comply with antitrust and fair competition laws. This also applies to associates who participate in trade associations or industry groups. You 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, associates 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 the Legal Department:

- 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;
- Limiting a customer as to the territories in which or the customers to whom, a product or service can be resold or leased; and
- Licensing of technology.

Milliken's Legal Department can provide specific rules applicable to your business in a particular region.

### EXAMPLES OF ANTITRUST & ANTI-COMPETITIVE BEHAVIOR

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

*Several competing companies agree to set and keep their prices high.*

*Sales representatives at competing companies 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."*



## INTERNATIONAL BUSINESS

Most countries have laws regulating international trade including imports, exports, free trade agreements and international financial transactions. It is your 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

Milliken will comply fully with applicable export control laws as well as all other applicable laws in any country in which we operate. Associates are responsible for knowing with whom they are dealing and must not do business with individuals or entities specifically prohibited by law or countries that fall under trade embargoes or economic sanctions. Associates 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 the Company's foreign subsidiaries and associates.

### Customs Laws

Import laws require the Company to make accurate declarations regarding items being imported and to pay applicable customs duties and related taxes. Milliken 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.

### Free 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 the success of the Company. In many cases, very complex qualification processes are required to gain the benefits of the agreements. We will only participate in a given 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.

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

#### EXAMPLES OF QUESTIONABLE INTERNATIONAL BUSINESS PRACTICES

*Dan, 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 the Company to certify that it will not do business with any Israeli firm.*

*Sara, 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.*

## CONFIDENTIAL INFORMATION & DATA PRIVACY

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### Milliken's Confidential Information

Milliken's business information is very valuable and must be protected. Milliken associates are expected to respect the Company's confidential business and financial information by:

- Maintaining strict confidentiality of sensitive information. "Sensitive" information is any material that, if released, would negatively affect the reputation or competitive position of Milliken;
- Not sharing the information with anyone – even another associate – who does not have a need to know and who has not been authorized to receive it other than as required by law; and
- Not using Company information for personal gain.

Obligations to confidentiality extend beyond an associate's tenure at Milliken. Even after leaving Milliken, confidential information may not be disclosed in any way. At the same time, confidential information that may have been obtained at a previous employer, including but not limited to trade secrets, may not be disclosed to Milliken.

### Third Party Confidential Information

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

See Milliken's Confidential Information Policy for additional information regarding the identification and handling of Milliken or third party information.

### Data Privacy

Milliken may receive personal information from associates, customers or other parties in the normal course of business. The Company is committed to collecting, processing and protecting personal information responsibly and in compliance with Milliken policies and applicable privacy and information security laws. See Milliken's Data Privacy Policies for additional information.

## MARKET INTELLIGENCE

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Milliken has 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 by both Milliken associates and agents of the Company:

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

### EXAMPLE OF IMPROPER COLLECTION OF COMPETITIVE INFORMATION

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

## INSIDE INFORMATION AND TRADING SECURITIES

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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 at the Company, you may learn inside information about our publicly-traded customers, suppliers, subcontractors, acquisitions targets or others.

For purposes of this policy, it is important to understand the following terms:

- “Material” information is information important enough that it could affect an investor’s decision whether or not 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.

Milliken associates may not trade in stock or other securities on the basis of 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 Milliken’s business activities.

### EXAMPLES OF IMPROPER USE OF INSIDE INFORMATION

*Heidi 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.*

*Neal, an engineer, learns that the Company is considering entering into 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, Wang hears from that supplier’s salesman that Wall Street will be disappointed with their quarterly results. On her way home from work that evening, Wang calls her broker to sell the supplier’s stock.*

## POLITICAL ACTIVITY, COMMUNITY INVOLVEMENT AND CHARITABLE GIVING

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We encourage our associates to be engaged members of their communities. This includes being active, knowledgeable participants in the political process; however, political activity must be done on personal time and must not involve, or appear to involve, Company assets. Examples of Company assets include money, facilities, phones, emails, letterhead or other items owned by the Company.

On occasion, the Company will present educational material on political issues that affect associates’ jobs or livelihood in order to assist them in making informed choices. However, it is expressly forbidden for any Milliken associate to pressure other associates to make political contributions or to participate in support of a particular political party or candidate.

While political opinions and community involvement are the right of all associates, you must not represent yourself as acting on behalf of the Company in political activities, before government agencies or on boards of directors or other advisory positions unless specifically authorized to do so.

Charitable giving is a personal decision. While the Company will occasionally organize charitable giving campaigns, no associate will be subjected to real or perceived pressure to participate unless it constitutes part of their assigned job responsibilities.

Questions regarding political activity or authorization should be sent to Milliken’s Corporate Communications office.

### EXAMPLES OF INAPPROPRIATE POLITICAL ACTIVITY AND GOVERNMENT LIAISONS

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

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

## 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 the Company's assets and integrity.

Milliken associates must refrain from making 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. Decisions on the degree of Company participation with the media will be made on a case-by-case basis. All responses to media inquiries must be coordinated and approved by Milliken's Corporate Communications office.

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.

The Company's credibility and ultimate effectiveness may depend upon releasing accurate information to associates and to the public through the media. This is especially applicable in crisis situations. In no case, however, should any Milliken associate act as a Company spokesperson without prior approval from the Corporate Communications office, Legal Department or the Chief Executive Officer.

### EXAMPLES OF IMPROPER MEDIA ENGAGEMENT

*Katherine, a marketing manager, gives an interview with her local newspaper and describes her division's exceptionally strong sales as one of the reasons behind the Company's success.*

*A trade reporter asks Ernesto, a process engineer, how his group got the idea for a new process for finishing a line of industrial fabrics. He proudly describes the exciting new product development process in detail.*

## SOCIAL MEDIA AND NETWORKING SITES

Social media has changed the way we communicate and share information on a daily basis. While social media creates new opportunities for discussion and collaboration, it also brings additional responsibilities. Examples of social media sites include networking sites, blogs, photo and video sharing sites, forums and chat rooms.

If your job responsibilities at Milliken 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 the Company's reputation. Questionable statements or images posted by you may reflect negatively on the Company. Never post confidential information about the Company, colleagues, customers, suppliers or business partners on social media sites.

Contact the Corporate Communications office if you have questions about the use of social media.

### EXAMPLES OF IMPROPER PUBLIC SOCIAL MEDIA USAGE

*Enrique, a production manager, posts his department's holiday run schedule on Facebook to communicate with his team.*

*Sally, 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.*



## 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 fulfilling our obligations to our management, Board of Directors and shareholders and to the success of our Company.

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 the Company's ethical values, mission, resources and assets.

Company financial information must be held confidential and only made available to those associates and external parties when approved by the Corporate Controller or CFO.

### Completeness and Accuracy of Company Records

All business transactions must be properly authorized and completely and accurately recorded in compliance with Milliken's financial policies. Improper entries to financial records by associates or others must be reported to the Legal Department or Human Resources.

### Communicating Accurate and Timely Information

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

### Recordkeeping and Retention

Associates are responsible for knowing their function's record retention policies and procedures including how data is stored, retrieved and archived. It is your responsibility to know how to document, maintain and report any information and records for which you 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 the Company's auditors, Human Resources, Legal Department or senior management for:

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

#### EXAMPLES OF IMPROPER FINANCIAL RECORDS AND POOR CONTROLS

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

*Tim, a plant accountant, is instructed by his manager to charge ordinary operating expenses to an inventory account in order to mask plant cost performance.*

## CONCLUSION

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The Milliken Code of Conduct is a guide to help our associates understand what constitutes ethical behavior. The Code is not intended to address the ethics of every potential situation, so the Company provides multiple ways for associates to seek additional guidance. If you are ever in doubt regarding what the Company considers to be the right thing to do, contact your manager, Human Resources, the Legal Department or a trusted fellow associate who is in a position of influence and expertise with respect to the question or suspected violation for guidance.

All Milliken associates have a duty to report any suspected violation of this Code, Company policy or applicable laws. Suspected violations should be reported to a manager, Human Resources, the Legal Department or a trusted associate mentioned above. Reporting concerns directly to a Company representative facilitates the most effective response. If circumstances prevent you from reporting an issue directly to the Company, you can call the Milliken Ethics HelpLine at 1-866-327-8419 (see [values.milliken.com](http://values.milliken.com) for dialing instructions from outside the United States) where you will be able to speak with a compliance agent who is not affiliated with Milliken. These reports can be made anonymously if permitted by local law. All reports will be treated confidentially, taken seriously and investigated appropriately.

Milliken has a strict non-retaliation policy. Retaliation or other types of intimidation against anyone reporting a suspected violation of this Code or applicable law in good faith is prohibited regardless of whether the allegation is proven to be true.

### Annual Acknowledgement

All Company associates are required to sign an annual statement acknowledging that they have read and understand Milliken's Code of Conduct. They are required to attest to being in full compliance with the Code and to their obligation to report suspected violations committed by themselves or others.

## ACKNOWLEDGEMENT

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I have carefully read the **Milliken Code of Conduct**, and I understand the importance to the Company of compliance with its provisions.

I fully realize the importance to the Company of: protecting the Company's reputation; maintaining a safe, respectful and environmentally-responsible workplace; safeguarding proprietary and confidential information; properly handling Company funds, assets and records; proper use of Company electronic systems; and all Company associates adhering to the principles in this Code of Conduct. 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. I have no knowledge of any violations of this Code of Conduct. I will promptly report any such developments in the future.

I fully realize that it is the policy of Milliken to observe all laws that govern the conduct of our business, including laws that prohibit unauthorized duplication of copyrighted material including computer software. I further realize that factual reporting and accounting in all phases of the Company's operations are required both by law and Company policy.

Violations of this Code of Conduct or the Milliken Policy Manual may be subject to disciplinary action according to the Company's disciplinary process. Nothing herein changes your employment status (i.e., at-will employment where applicable). The Milliken Policy Manual can be reviewed on the intranet or in the Human Resources Department. In the event that anything in this Code of Conduct or the Milliken Policy Manual contradicts applicable law or regulation, the latter prevails.

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Milliken Associate Name (Please Print)

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Milliken Associate Signature

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Date

*Milliken has a strict non-retaliation policy. No one will be retaliated against or punished for reporting suspected ethical or legal violation in good faith.*

