



Code of Conduct

December 1, 2020



Dear Employees, dear Business Partners,

As a multinational company we provide top-quality products and services throughout the world. Our commitment is the basis for our success, both today and in the future.

The Forbo Code of Conduct sets out our most important business principles and basic values which are based on the Forbo Way to Win. These principles and values define the identity of Forbo.

The Code of Conduct is central to the way we protect and develop our reputation. It is built on the principles of integrity, transparency and fairness, and describes how we behave. The Code of Conduct shall serve you as a guideline in your daily work even if not each and every situation can be covered.

The Code of Conduct not only ensures but goes beyond compliance with the laws and regulations wherever we run our business. It demonstrates our commitment to acting ethically and with integrity in every situation while at the same time respecting people's rights as individuals. We expect this of every single employee, everywhere, every day. We also expect this of all our business partners. High standards in our relationships are the foundation for lasting success.

We ask you to comply with the Forbo Code of Conduct and play your part in turning into action the high standards of conduct which all of our stakeholders expect from Forbo.

A handwritten signature in black ink, appearing to read "This E. Schneider".

This E. Schneider
Executive Chairman

A handwritten signature in black ink, appearing to read "Stephan Bauer".

Stephan Bauer
CEO

Forbo Core Values

Forbo Way to Win In order to ensure a strong and common organizational culture throughout the Forbo Group, we have defined three core values which encompass three specific guiding principles:



Inspiring

- Developing ideas and seizing opportunities
- Knowing what matters and focusing on it
- Raising enthusiasm and convincing others



Daring

- Taking bold and decisive action
- Giving our all with power and passion
- Achieving goals with determination and stamina



Caring

- Challenging and encouraging oneself and others
- Taking responsibility and making a difference
- Leading by example to shared success

Responsibilities

Shareholders It is Forbo's aim to increase shareholders' value. This includes protecting shareholders' investment and providing a sustainable long-term return higher than those of other leading companies in the same or similar industries.

At Forbo, the concept of Corporate Governance encompasses the entire set of principles and rules on organization, conduct and transparency designed to protect the shareholders' interests. Further information on the Forbo concept of Corporate Governance can be found in the Annual Reports.

Employees The Forbo employees play a fundamental role in the performance of Forbo as a business. Forbo ensures fair treatment of all employees and aims for the highest, internationally acknowledged benchmarks of fairness, honesty and integrity.

Customers Forbo is committed to providing products and services which consistently offer value in terms of price and quality, and which are safe for their intended use.

Suppliers, Distributors and other Business Partners Forbo pursues mutually beneficial relationships with its business partners, in particular suppliers and distributors. The company seeks and prefers business relationships with partners who are committed to the basic principles of this or a similar, own code of conduct. This includes the obligation to act fairly and with integrity towards stakeholders, to protect the environment, and to observe the applicable laws of the countries in which they operate.

Society/Community Forbo strives to make a positive contribution to the well-being of society and the local communities in which it operates. Forbo is conscious of its social responsibility and takes this very seriously. Forbo observes the applicable tax regulations and rejects tax evasion and activities that facilitate it.

Environment Forbo is committed to actively protecting the environment within its sphere of influence, and aims to minimize the environmental impact of its operations and products by integrating environmental policies, laws and regulations into every business unit.



Business principles and standards

Compliance with laws and internal regulations

Forbo and its employees comply with all applicable laws and regulations, national and international codes and conventions wherever they do business.

The laws and regulations may differ from country to country, and sometimes may be in conflict with each other or difficult to interpret. In this case, employees are expected to comply with the applicable laws to their best knowledge and belief, and to ask for advice when uncertain.

Forbo has implemented such laws and regulations through internal regulations and guidelines which may go beyond the minimum legal requirements. Forbo employees are expected to go the extra mile in not only ensuring strict compliance with laws and regulations but also in contributing towards the achievement of the goals of such laws and regulations.

We undertake to be aware of the laws and Forbo regulations and guidelines that are relevant for the exercise of our professional duties. We undertake to comply with each and any such law, regulation or guideline.

Business integrity: no tolerance of any form of corruption

Corruption distorts competition, leads to higher costs, destroys the trust of customers and suppliers, and ultimately puts jobs at risk. Hence, Forbo rejects any interference with or falsification of competition by bribery, facilitation payments, fraud, industrial espionage, theft, coercion etc. Also, no donations may be made to political parties, to political organizations or to individual persons holding political office.

Forbo generally prohibits the offering, giving or taking of bribes in whatever form (including, but not limited to, improper commission payments or other means to provide improper benefits to customers, agents, suppliers, officials or contractors). Forbo also prohibits its employees from arranging or accepting monetary benefits or improper commissions for their own benefit or that of their families, friends, colleagues or acquaintances.

Employees, who attempt to unfairly influence officials or allow themselves to be unfairly influenced by acts as mentioned above will be punished by either disciplinary or labor law measures – notwithstanding any other consequences under civil or criminal law.

Facilitation payments

Any sort of facilitation payments (or so-called “grease” payments) to local, national or international officials, even when these are small in amount, which are made to secure or expedite the performance of routine or necessary actions to which the payer of the facilitation payment has a legal or other entitlement, are a form of bribery. Hence, such payments may not be made.

Gifts, entertainment and other advantages

Forbo prohibits the offer or acceptance of gifts, entertainment, hospitality, expenses or other advantages whenever such arrangements have any effect or might reasonably be believed to influence the outcome of business transactions or are not reasonable and bona fide expenditures.

All gifts received by a Forbo employee should be notified to the supervisor.

We do not engage in any form of bribery (including facilitation payments), whether active or passive, direct or indirect. We do not offer or accept any inappropriate gifts or other advantages.

Fair Competition

Forbo is committed to the principles of fair competition. It ensures that all business practices fully comply with the applicable competition laws and laws against unfair competition wherever business is conducted.

In particular, the following practices are prohibited:

- explicit or tacit agreements with competitors on pricing, allocation of territory and quantities and the exchange of information on any of these;
- explicit or tacit agreements with suppliers and distributors or other customers which unlawfully restrain competitors, suppliers, distributors or customers;
- abuse of a dominant market position (monopolization).

Any acquisition or entering into a joint venture agreement requires the consent of Corporate M&A who will arrange for the necessary clearances of the competent authorities.

**We comply with the applicable competition laws.
We deal fairly, honestly and in good faith with
customers, business partners, the public, our
competitors, third party service providers
and others.**

Rights of Employees

Labor rights

Forbo complies with all labor laws, national and international codes and conventions. Forbo recognizes the employees' rights to become members of labor unions and similar associations. The representatives of such unions or associations shall not be discriminated.

Forbo does not use forced or compulsory labor. Forbo pays market-rate wages, does not demand excessively long working hours, and remunerates overtime in line with the applicable working time laws. Forbo refrains from any form of child labor.

Discrimination and harassment

Forbo is committed to maintaining a workplace environment free from discrimination and harassment. Forbo does not tolerate any form of discrimination based on race, gender, religion, creed, national origin, disability, age, sexual orientation, political views or other similar characteristic features.

Career development

Forbo fosters the development of the careers of its employees, in particular through continuous education, job enrichment, job rotation and management development.

**We provide equal opportunities and an environment
where we respect the rights of colleagues to work
free from any form of discrimination or harassment.**

Health, Safety and Environment

Forbo attaches great importance to the protection of the environment and the health and safety of its employees as well as any other persons who could be affected by its activities or products.

It is the responsibility of each individual working for Forbo to comply with all environmental regulations and all legal regulations concerning the protection of health and safety. Beyond these legal requirements, every employee shall aim to conserve the environment in which he or she works, and to reduce the ecological footprint of their activity for Forbo. Forbo will provide information, training and motivation to encourage employees to act in an environmentally responsible and sustainable manner.

We comply with the letter and the spirit of health and safety laws as well as environmental regulations, and respect and protect the environment wherever we work.

Conflicts of interest

Forbo employees shall act in an objective manner and thus avoid any activities or engagements which might be detrimental to the interests of Forbo or which are in conflict with their professional responsibilities.

Conflicts of interest mostly arise when an employee is in the position to award business contracts, hire staff, has access to potentially interesting information on the financial markets, or is offered employment by a competing company. Situations which lead to conflicts of interest are, in particular:

- outside employment or collaboration which may conflict with the performance of the job at Forbo;
- contracting with business partners that are managed by family members or friends;
- investments in companies that compete with Forbo.

Employees shall not take part in any business activities where they may be influenced by their personal relations that are, or may be construed as a hindrance to objective decision-taking.

In situations when an employee's personal, family or financial interests are in conflict or may be in conflict with those of Forbo, the employee is expected to disclose all relevant information and ask advice from his/her superior or the Corporate Compliance Officer.

We conduct all business transactions with the best interests of Forbo in mind. Under no circumstances will we exploit any business opportunity that conflicts with the interests of Forbo.

Use and protection of assets and information

Employees entrusted with property belonging to or controlled by Forbo are responsible for the careful use and protection of such assets. Company assets are intended to be used for business purposes only. Personal use is limited and only allowed if it is not in conflict with the interests of Forbo, this Code of Conduct or other rules and policies.

Internal company information and intellectual property must be treated confidentially except to the extent that Forbo or a Forbo employee is required to disclose such information in the proper course of his/her duties or by law.

Data Protection and Privacy

Forbo respects and protects personal data and the privacy of the individual. Employees who process personal data are required to comply with the specific regulations and to treat such data in a way that complies with the applicable laws, and, in particular, to respect the privacy of the individual.

Use of information technology

E-mail, intranet and internet systems are provided by Forbo for business use. Regarding the use of computers, the intranet, the internet and the software at work, all employees are required to follow the internal Forbo guidelines. All employees are required to protect the networks of the Forbo Group and to avoid criminal acts and the misuse of software.

We protect Forbo's assets and intellectual property rights. Personal data shall be processed in a way that ensures the privacy of the individual.

Records and Accounting

All business transactions are recorded in an accurate, complete, true, fair, consistent and timely fashion. All books and accounts must be available for internal and external audit.

We properly record all business transactions in our books.

Regulations regarding trading of Forbo securities

Forbo Holding Ltd is listed at the SIX Swiss Exchange, Zurich, Switzerland. Its shares are publicly traded and Forbo and its employees are therefore subject to particular rules and restrictions.

Ad hoc publicity

Forbo is subject to the SIX rules on ad hoc publicity. These rules regulate the use and disclosure of potentially price-sensitive, not publicly known information that arises in connection with the business activities of Forbo. Price-sensitive information consists of new facts or other information (such as financial figures, acquisitions, etc.) which is likely to result in significant movements in the price of securities. The disclosure of such information is subject to particular rules that ensure that disclosure is made in a coordinated and timely manner that ensures equal treatment for all market participants.

Forbo employees may not disclose price-sensitive information. All disclosure of price-sensitive information has to be coordinated by Corporate Communications.

Insider trading

Forbo prohibits securities trading with Forbo securities (such as shares, options, etc.) based on material non-public information. Such information is material if an investor could consider it as important in deciding whether to buy or to sell a Forbo security.

Forbo employees shall not use material non-public information for personal gain or for the personal gain of others. They shall not disclose such material non-public information to anyone, including friends and family. In the event of an employee obtaining material non-public information, that employee is prohibited to trade on, or otherwise profit from, such information.

Details on this subject are contained in the Forbo Holding Ltd Securities Trading Policy which applies for all Forbo employees.

Swiss Code of Best Practice

Forbo goes beyond what is legally required and operates in line with the principles of the Swiss Code of Best Practice.

We undertake not to disclose price-sensitive information regarding Forbo to the public and not to use material non-public information for personal gain or for the personal gain of others.

Implementation and Compliance

This Code of Conduct replaces the Code of Conduct of May 1, 2014. It applies to all employees of Forbo and is an integral part of the employment contract. Every employee receives a copy of the Code of Conduct when he/she joins Forbo.

We know the content of this Code of Conduct and abide by its obligations.

The Code of Conduct is public and, therefore, also available on Forbo's website.

Regular compliance audits are performed with respect to the adherence to applicable laws and regulations as well as this Code of Conduct.

Managers at all levels are required to ensure compliance with this Code of Conduct.

Any violations of this Code of Conduct will be punished by either disciplinary or labor law measures – criminal and/or civil law consequences notwithstanding.

Any violations of this Code of Conduct must be communicated to the Corporate Compliance Officer of Forbo (via e-mail to compliance@forbo.com or by telephone at +41 58 787 25 46). If this appears appropriate, violations should also be reported to the respective superior. Forbo welcomes all information of this kind passed in good faith. Forbo strives to ensure that employees who communicate violations are in no way disadvantaged at their workplace as a result. However, deliberately false accusations will lead to sanctions, including termination of the employment.

We will report immediately if we suspect or notice a violation of the law, this Code of Conduct, other company policies, ethical guidelines and principles, or if asked to do something that might constitute a violation.

Baar, December 1, 2020



This E. Schneider
Executive Chairman



Stephan Bauer
CEO