

Karndean
Designflooring

Our Green Claims Policy



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Introduction

As signatories of The Anti-Greenwash Charter, we are committed to upholding good standards of responsible marketing practice. The purpose of this policy is to define the standards we adopt throughout our organization to ensure green claims made about our products/ services are fair and substantiated.

This policy applies to all the forms of marketing and advertising we use, including television, radio, online (including social media and influencer marketing), print, packaging, direct, tradeshows and events, point of sale, in store signage, and all other professional promotions and communications.

In addition to this policy, all marketing and communications must always comply with the relevant local laws and regulations.

Our standards

We commit to the standards of communication set out in [The Anti-Greenwash Charter](#), which are as follows:

Transparency

We commit to clear communication of what sustainability benefit our product or service offers and don't conceal or omit information.

Accountability

We substantiate our sustainability claims with accurate, and regularly evaluated empirical evidence. We commit to sharing facts, figures and statements that can be checked.

Fairness

We commit to using fair, clear and unambiguous language when providing comparisons with other products or organisations.

Honesty

We ensure we make specific statements about our organisation's sustainability efforts and that our actions match those promises.

Our practices

We implement the following practices and procedures to ensure we uphold our standards:

- Clearly define the green terms we use
- Set standards for authentic and accurate visual representation
- Outline a clear editorial process
- Clarify our approach to evidence and testing
- Provide evidence and make test results available
- Detail the training we provide our employees
- Introduce our escalation procedure
- Share our approach to customer education
- Explain how we support partners and collaborators
- Commit to regular reviews and effective governance

Definitions

We define all the key 'green' terms, acronyms and simplify the scientific concepts that form the language of sustainability to ensure our claims are clear and transparent:

Carbon footprint

A measure of carbon dioxide emissions from products, manufacturing, business operations, etc.

Carbon negative

Absorption and removal of carbon dioxide is greater than the amount of carbon dioxide that is being emitted; better for the environment than being carbon neutral.

Carbon neutral

The amount of carbon dioxide emitted is negated – i.e., neutralized – by the amount reabsorbed by trees and oceans.

Closed loop

Sustainable supply chains that reuse raw materials, conserving natural resources and diverting waste from landfills; sometimes referred to as "circular economy."

CO₂e

Carbon dioxide equivalent is a term for describing different greenhouse gases in a common unit. For any quantity and type of greenhouse gas, CO₂e signifies the amount of CO₂ which would have the equivalent global warming impact.

Environmental Impact

The effect on the environment of actions taken by our business.

EPD

Environmental Product Declarations report objective third party-verified data about a product's environmental impact across its life cycle.

ESG

Environmental, social and governance assesses an organization's practices and performance based on sustainability and ethics. Some investors use ESG criteria in evaluating opportunities.

GHGs

Greenhouse gases trap heat in the atmosphere and contribute to climate change. They include carbon dioxide, which enters the atmosphere through burning fossil fuels (coal, natural gas, oil), and methane, which is emitted during production and transport of fossil fuels.

Greenwashing

A marketing tactic used to make misleading claims about the environmental benefits of a product or service.

ISO

The International Organization for Standardization is an independent, non-governmental organization that develops standards to support innovation and provide solutions to global challenges. ISO certification verifies adherence to best practices.

Karndean Evolve™

The published framework that outlines our commitment to sustainability and details actions for six key focus areas, including: confronting climate change, the health and wellbeing, sustainable resource use, inclusion and diversity, supply chain transparency, and education.

LCA

Life cycle assessments provide the foundation for an EPD, evaluating a product's environmental impact over its entire life cycle: material extraction, manufacturing, usage and end of life.

Net zero

Refers to cutting greenhouse gas emissions from human activity to as close to zero as possible, with any remaining emissions reabsorbed from the atmosphere by oceans and forests.

Off-gassing

Off-gassing is the release of chemicals from new products into the air. Often found with new mattresses and carpets, these chemicals can cause allergic reactions in humans. Our products have very low emissions and achieve the highest ratings for indoor air quality.

Phthalates

Chemicals used to make plastics more durable. Our products are certified "phthalate-free," meaning they are free from ortho-phthalates that can affect human health. Our products do not contain the plasticizer DEHP/DOP.

The products do contain a different group of phthalates, terephthalates, which have not been found to affect human health.

Post-consumer recycled content

Material from products at the end of their life cycle that otherwise would go to a landfill.

Post-industrial recycled content

Material that's recycled after the manufacturing process but before being used. It can come from trimmings, byproducts or defective items produced during manufacturing.

PVC

Polyvinyl chloride is the primary raw material in luxury vinyl flooring. Its exceptional durability makes PVC the most widely used polymer in building and construction, but it also is used in medical products such as dialysis tubing and heart- and lung-bypass tubing.

Renewable energy

Energy from natural sources such as sunlight and wind that are replenished more quickly than they are consumed. Renewable energy can be used for electricity generation, heating, cooling and transportation.

Science-based targets

Science based targets are a formal way for a company to define emissions reduction targets. They focus on the quantity of emissions that need to be reduced to meet the targets set out in the Paris Climate Agreement. This is to limit global warming average temperature increases to 1.5°C/2.7°F. The process is administered by the Science Based Targets Initiative (SBTi).

Sustainability

The integration of environmental, social and economic concerns to create healthy, diverse and resilient products and communities for generations to come.

Most of our products are certified to NSF/ANSI 332, the foremost U.S. standard by which to evaluate and verify sustainability of floor coverings across the entire product life cycle.

Our products are also manufactured in purpose-built factories certified to the ISO 14001 environmental standard, which provides a framework for measuring and reducing environmental impact, from facility water usage to eco-friendly product packaging.

VOCs

Volatile organic compounds (VOCs) are emitted as gases that can affect indoor air quality. Annually, our factories are audited, and our products tested by an independent 3rd party to maintain our stringent air quality standards. All our flooring products achieve Eurofins Indoor Air Comfort (Gold) certification and are FloorScore® certified for post-installation indoor air quality.

If you come across a term you don't understand and can't find it on this list, please email sustainability@karndean.com for clarification.

Use of images and color

In our commitment to transparent and honest communication regarding our sustainability efforts, we recognize the powerful impact of visual representation in shaping perceptions. Therefore, we uphold the following principles related to the use of imagery and colors in our marketing materials:

Authentic Imagery

We commit to using genuine and representative images of our products, services, and initiatives, avoiding the use of stock photos that may mislead or give an exaggerated impression of our green efforts.

Avoidance of Greenwashing through Colors

The use of green or earth tones in marketing materials can evoke feelings of environmental friendliness. We ensure that such colors are used responsibly and are not misleading, if a product is represented as being sustainable, we ensure it has substantiated green credentials to back up such representation.

Highlighting Actual Efforts

When showcasing our sustainability roadmap or initiatives visually, we will only use images from actual initiatives we have undertaken, avoiding generic or unrelated imagery that may give a false sense of our environmental impact or efforts.

Transparency in Photo Alteration

Any alterations or edits to photos that may change the reality or context of our green initiatives will be clearly disclosed. This includes photoshopped elements, exaggerated effects, or other changes that might give a misleading impression.

Cultural & Environmental Sensitivity

We ensure that any imagery used respects the cultural, environmental, and socio-economic context of the regions or communities depicted. This includes avoiding imagery that may be perceived as appropriating or misrepresenting cultural or environmental elements.

Educative Infographics

Where possible, we will use visual aids such as infographics to simplify and convey complex sustainability data or concepts. These visuals will always be based on substantiated facts and will be designed in a manner that is easy to understand without misrepresenting the information.

For any concerns or questions regarding the imagery and colors used in our marketing materials, or if you believe we are not adhering to the standards set out in this section, please contact Kevin Andrews at kevin.andrews@karndean.com. We appreciate feedback and are dedicated to continuous improvement in our visual communications.

Editorial processes

All sustainability marketing materials and communications, including the Karndean Evolve plan and glossary of terms, are housed in a shared folder accessible to all team members. All files are named

to include the approval date to easily identify outdated content. Content creation begins with referencing approved copy, terms, and images from this folder.

Any sustainability content derived from approved copy undergoes a thorough review by the respective Marketing Manager for final approval.

The development of new sustainability-focused marketing materials involves collaboration between our US and/or Global Sustainability Lead and the Marketing Team from the briefing stage onwards. Once the content is agreed with the Sustainability Leads, it is then reviewed in its final format to review the copy in context, in collaboration with feedback and approval from marketing leadership prior to publication.

The sales team exclusively uses approved content from the Marketing Team and Sustainability Leads for their sales tools and presentations. This expectation is regularly reinforced during sales meetings to emphasise its importance.

We actively encourage staff members to raise questions or concerns regarding our green claims, fostering a culture of accountability and transparency around the business.

Evidence and testing

All claims that are made are independently verified. When making claims we will always refer to the certification we have received that is linked to the claim.

Training

All new employees receive training on our Green Claims Policy and The Anti-Greenwash Charter so they fully understand the issues and benefits. Alongside our Karndean Evolve Training: Climate Change e-learning module to give colleagues the knowledge and expertise to talk to customers about our sustainability approach and challenge any green claims made by colleagues that do not align to our approach.

Our Green Claims Policy is hosted on SharePoint and our training system for colleagues to access whenever they need a refresher.

Each year, all customer-facing employees complete a mandatory refresher training session on greenwashing.

Customer engagement

We know our customers are invaluable in our fight against greenwashing, which is why we commit to answering any emails about our green claims within three working days. We regularly conduct user research to find out how our customers interpret our green claims to ensure that they are clearly understandable.

If you have any questions or feedback on this policy or our green claims, please email Kevin Andrews at kevin.andrews@karndean.com for clarification or alternatively submit any greenwashing concerns directly to The Anti-Greenwash Charter for independent review [here](#).

Customer education

Our strategy for customer education involves creating content that informs customers about sustainability issues, including the environmental impact of our products life cycle and the key focus areas that make up our sustainability roadmap. This content is designed to be accessible and engaging, helping to raise awareness and understanding of key sustainability topics.

Commercial

We educate our commercial customers through CEUs, lunch & learns, and information made available on our website. If you would like to book a CEU course or lunch & learn, please contact your Karndean representative or email info@karndean.com.

Retail and Consumers

We educate these customers via the Karndean Evolve landing page on our website, here they can access our sustainability marketing materials and global sustainability report. We also communicate our sustainability efforts in print materials where applicable.

Partnerships and collaborations

We are dedicated to promoting sustainability and responsible marketing practices across our network of manufacturers and partners.

We actively engage with our partners to encourage alignment with our sustainability values and the principles outlined in this policy. This engagement involves referring The Anti-Greenwash Charter, while also sharing knowledge and resources to enhance their understanding and implementation of responsible marketing practices.

We uphold transparency in all our partnerships. Clear communication about the sustainability efforts of our collaborators is essential. We inform our stakeholders about the sustainability credentials of our partners, reinforcing our commitment to upholding our sustainability goals and public commitments, and encouraging a broader adoption of responsible marketing practices.

Regular reviews

We carry out recurring internal audits of our content and check all our references are up to date. During these audits, we also check for new developments in the industry that we can benchmark against.

Being a signatory of The Anti-Greenwash Charter is a continuous process; as such, we review our marketing practices annually to ensure we are still compliant with any changes to the Charter.

Governance of this policy

Marketing leadership is responsible for ensuring that our compliance with this Green Claims Policy is reviewed annually. Any non-compliance with this policy will be brought to the attention of the Executive Management Board (EMB), who will decide on further actions and whether the matter should be escalated further.

Business area heads are responsible for establishing and following practices, instructions and operating models in line with the Green Claims Policy. The Marketing Team reviews and updates all our marketing policy guidelines.

Before entering new partnerships with third parties, such as suppliers, we share our Green Claims Policy with them to encourage adoption of similar standards.

Independent reviews

As a signatory of the Anti-Greenwash Charter, we actively endorse independent reviews to validate our Green Claims Policy practices & procedures. These periodic evaluations ensure our commitment to responsible marketing practice. We understand that any non-compliance could lead to a revocation of our certified signatory status.

Plans for Improvement

To fulfil the Karndean Evolve™ promise we worked with Jamie Shaw, our Global Head of Sustainability to conduct a thorough review of our sustainable practices. Through this audit we identified key areas of improvement and created a sustainability action plan with specific targets to accomplish our goals.



Campaign Review Report.

Signatory: Karndean Designflooring (North America)

Date: September 2025

Introduction.

This report provides a transparent evaluation of Karndean Designflooring's *Karndean Evolve Campaign* for compliance with its Green Claims Policy (GCP), as part of its commitment to The Anti-Greenwash Charter.

Campaign reviews play a critical role in ensuring that all environmental claims are substantiated, language is accurate, and best-practice communication procedures are followed. By upholding the Charter's standards, the review process reinforces transparency, helps prevent greenwashing, and builds stakeholder trust.

Each campaign review involves a thorough examination of submitted materials, where all claims and terms are cross-referenced against the GCP and supporting evidence of practice and procedure analysed. The review concludes with one of three outcomes:

- **Compliant:** The campaign fully aligns with the GCP, demonstrating responsible governance.
- **Compliant with Recommendations:** The campaign meets GCP standards, but minor improvements are suggested to enhance future compliance.
- **Non-Compliant:** The campaign fails to meet the GCP's requirements, necessitating corrective action.

This assessment is both a compliance check and an opportunity for Karndean Designflooring to continue demonstrating leadership in authentic, responsible communication.

Review Overview.

Summarises the campaign's overall alignment with the Green Claims Policy, highlighting key strengths, areas for improvement, and the final compliance outcome.



Signatory: Karndean Designflooring (North America)

Campaign Title: Karndean Evolve

Description: A sustainability-led communication initiative run during Earth Month 2025, highlighting the Karndean Evolve platform, directing audiences to sustainability information and certifications, referencing recent actions, and positioning Karndean's broader commitments.

Publication Date: 02/04/2025

Compliance Summary.

The campaign demonstrates clear alignment with Karndean's GCP. Visuals are restrained and factual, written content underwent documented editorial approval, and training is in place across relevant teams. Strongest compliance is seen in the directional claims (certifications and information access), which are fully verifiable.

Subject-line language such as "creating real change" and "a major milestone" is less precise and not defined within the GCP, creating potential ambiguity. Stakeholder engagement was not actively facilitated through this campaign.

The overall rating is  **Compliant with Recommendations**

Language Analysis.

Reviews the environmental and sustainability-related terms used in the campaign, assessing whether they align with the signatory's Green Claims Policy glossary, are applied accurately, and require any additions or clarifications.

Key Terms Identified:

Term/Phrase	In GCP?	Used Accurately?	Action Required
Karndean Evolve	✓ Yes	✓ Yes	None
Environmental impact	✗ No	✓ Yes, but broad	+ Add to glossary for clarity
Responsible design	✗ No	✓ Yes, but broad	+ Add to glossary for clarity

Summary.

Most terms are well grounded in the GCP. However, broad phrases (“Environmental Impact”, “Responsible Design”) are not defined in the GCP and could introduce ambiguity if not linked to evidence.

Claims Analysis.

Evaluates the sustainability-related claims made in the campaign, checking them against supporting evidence, third-party verification where applicable, and assessing overall compliance with the Green Claims Policy.

Key Claims Identified:

Claim	Assessment	Guidance
Karndean Evolve is the company's sustainability platform	✔ Compliant	None
Certifications and information accessible online	✔ Compliant	Maintain links to certification bodies
Company has achieved a "major milestone"	△ Partially compliant	Must specify milestone, date, and verification
Creating real change	△ Partially compliant	Pair with measurable data or avoid
Commitment to transparency and responsible design	△ Partially compliant	Add "responsible design" to glossary; cite supporting practices
Recent sustainability actions	△ Partially compliant	Publish dated examples with evidence

Summary.

The most robust claims are those linked to certifications and information access, which are fully compliant. Broad achievement claims ("milestone," "real change") are only partially compliant unless tied to measurable evidence.

COMMUNICATION PRACTICES AND PROCEDURES:

Visual Materials.

Considers whether imagery and design elements adhere to the Green Claims Policy by avoiding misleading visuals and ensuring graphics support and clarify sustainability-related messages.

Karndeans Evolve Campaign - Social Posts



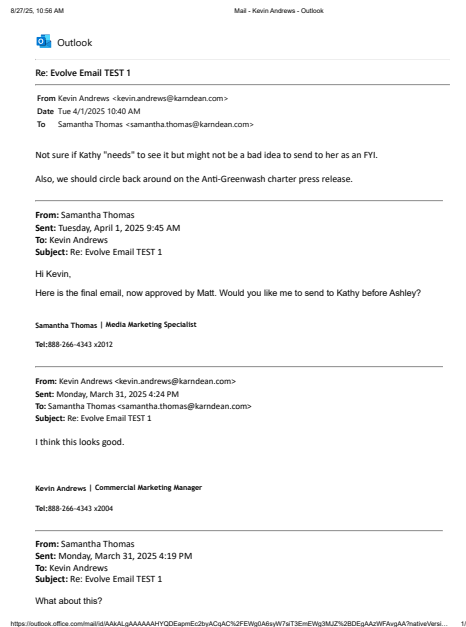
Declaration: Yes

Assessment: Visuals are restrained and text-heavy, focused on guiding audiences to information rather than presenting evocative or misleading imagery. Consistent with GCP standards.

Conclusion: Compliant

Written Content.

Examines the accuracy, tone, and editorial review of written materials to ensure they follow the Green Claims Policy and represent claims responsibly.



Declaration:  Yes

Assessment: Emails and campaign plan were reviewed by multiple editors (content manager, marketing managers, VP Marketing). Phrasing is clear and avoids exaggerated sustainability promises, though some broad terms (“creating real change”) lack precise definition.

Conclusion:  Compliant with Recommendations

Recommendations:

- Define subjective terms in GCP to prevent ambiguity.
- Add quantitative references (e.g., % of products certified, CO₂ saved).

Employee Training.

Verifies that staff have received appropriate training on the Green Claims Policy, ensuring awareness, understanding, and consistent application across campaigns.

22 **Anti-Greenwashing Charter Training**
Tue 1:30 PM - 2:00 PM
New Training Room [Calendar](#)

23 **Anti-Greenwashing - Marketing Training**
Wed 10:00 AM - 11:00 AM
Export Conference Room [Calendar](#)

25 **Anti-Greenwash Charter**
Fri 11:00 AM - 11:30 AM
Microsoft Teams Meeting [Calendar](#)

8/17/23, 10:58 AM

Outlook

Re: Anti-Greenwashing - Marketing Training

From: Kevin Andrews <kevin.andrews@karndean.com>
Date: Wed, 4/26/2023 10:58 AM

To: Dylan Christ <dylan.christ@karndean.com>; Matt Sobier <matt.sobier@karndean.com>; Rachel Atkinson <rachel.atkinson@karndean.com>; Luke Thomas <luke.thomas@karndean.com>; Samantha Thomas <samanthathomas@karndean.com>; Jennifer Urbanow <jennifer.urbanow@karndean.com>; Kelly Lindan <kelly.lindan@karndean.com>; Ashley Pearson <ashley.pearson@karndean.com>

Cc: Jenna Ross <jenna.ross@karndean.com>; Carol Fulton <carol.fulton@karndean.com>

Attachments: 2 files
AntiGreenwashing Training for Marketing Team.pdf; Karndean USA - Green Claims Policy - Approved 20230212.pdf

Hi team,

I have attached the powerpoint I went through, as well as the full Green Claims Policy for reference. This info can also be found on our Evolve landing pages on both Residential and Commercial sites.

From:
Sent: Thursday, April 17, 2023 9:33 AM
Subject: Anti-Greenwashing - Marketing Training

Setting up some time to discuss our Anti-Greenwashing charter and what that means for marketing. For those that cannot attend, I will plan to record the meeting and we can touchbase after.

Microsoft Teams [Send feedback](#)

[Join the meeting now](#)

Meeting ID: 237 598 987 555 5
Passcode: 8d3g6fda

Dial in by phone
+1 302 209 5018 961166444 United States, Orlando
[Find a local number](#)

Phone conference ID: 302 209 5018 961166444

Declaration: Yes

Assessment: Evidence shows anti-greenwashing training sessions scheduled and delivered. Training materials and GCP circulated across sales, marketing, and customer service teams.

Conclusion: Compliant

Recommendations:

- Formalise refresher sessions annually.
- Keep centralised training attendance records.

AI Oversight.

Reviews whether AI tools were used in the campaign, and if so, whether outputs were subject to human editorial control to meet ethical and compliance standards.

Declaration: ❌ Not applicable

Assessment: No AI tools used.

Conclusion: ✅ Compliant

Stakeholder Engagement.

Evaluates how the campaign provides and manages opportunities for stakeholder feedback, ensuring transparency, accountability, and responsiveness.

Declaration: ❌ No

Assessment: Campaign materials did not actively invite stakeholder feedback. While certifications and policies are accessible, there is no visible feedback mechanism for stakeholders to query or challenge sustainability claims.

Conclusion: ⚠️ Non-Compliant

Recommendations:

- Add a visible contact channel or form for sustainability-related inquiries.
- Maintain a log of feedback and responses for accountability.

Media Sentiment & Perception.

Assesses how the campaign is likely to be received by media, trade, and public audiences, identifying strengths and any potential reputational risks.

The *Evolve* campaign's alignment with Earth Month ensures relevance and visibility. Its restrained, factual tone positions Karndean as credible and proactive. Trade and client audiences are likely to respond positively to the accessibility of certifications and policies.

Risk areas include the use of broad language ("real change," "milestone") without supporting data, which may invite scepticism from sustainability-focused media. Absence of stakeholder engagement mechanisms could also be viewed as a gap in transparency.

Overall: Positive, but with potential scrutiny from specialist sustainability media.

Campaign Review

CERTIFICATE



Signatory: Karndean Designflooring (North America)

Campaign: Karndean Evolve

Description: A sustainability-led communication initiative run during Earth Month 2025, highlighting the Karndean Evolve platform.

Publication Date: 02/04/2025

Rating: **Compliant with Recommendations**

Reviewed



Campaign

The Anti-Greenwash Charter
antigreenwashcharter.com