

Conflict Minerals



Our Commitment to People

Mohawk respects and protects the human rights of all people. In locations where our products are manufactured or sold, our culture promotes respect for the people who make and sell them, the people living near our facilities, our suppliers and our customers. We are committed to fostering a safe, healthy and fair performance-based culture in inclusive work environments. A diversity of ideas, experiences, skillsets and backgrounds is intrinsic to our business and naturally reflects and supports the communities in which we operate.

We are committed to ethically sourcing materials.

“Conflict Minerals” refers to gold, columbite-tantalite (coltan), cassiterite, wolframite, and their respective derivatives, which are limited to tantalum, tin and tungsten. In July 2010, the United States passed legislation requiring all U.S. public companies to disclose the chain of custody of Conflict Minerals mined in the Democratic Republic of the Congo (DRC) and adjoining countries (the “Covered Countries”), where revenues may directly or indirectly finance armed groups engaged in civil war resulting in serious social and environmental abuses.

Mohawk Industries, Inc. is committed to ethically sourcing materials used in the manufacture of our products, and to ensuring that we are not sourcing Conflict Minerals that fund armed groups in the Covered Countries. In particular tin, tungsten and gold may be used in some of the glazes applied to certain ceramic tile products and, as a result, Conflict Minerals may be necessary for the function or production of such products (the “Covered Products”). The Covered Products represent a small percentage of our overall products, and Conflict Minerals constitute a very small part of our supply chain needs. Nevertheless, we are committed to sourcing such minerals responsibly.

Our due diligence framework follows the OECD Due Diligence Guidance. We perform an annual good faith reasonable country of origin inquiry (“RCOI”) with respect to the Conflict Minerals that may be necessary for the functionality or the production of the Covered Products. To conduct the inquiry, we i) distribute a survey to suppliers that we determine are at risk of providing products containing Conflict Minerals for the Covered Products based on the standardized Conflict Minerals Reporting Template developed by the Responsible Minerals Initiative (“RMI”), ii) review and assess the adequacy of the responses received and iii) follow up with suppliers where necessary. The RCOI is designed to determine, among other things, whether any Conflict Minerals are present in the materials or products sourced from the supplier and, if so, whether any such Conflict Minerals originated in the Covered Countries or are derived from scrap sources. In addition to the suppliers’ responses to the RCOI, we also review information regarding smelters and refiners provided by the RMI. RMI conducts an industry-standard Responsible Minerals Assurance Program (“RMAP”), in which it certifies smelters and refiners worldwide by conducting an independent audit to validate company-level management and sourcing processes for responsible mineral procurement.

In addition, we expect our suppliers to survey their suppliers to determine whether the applicable Conflict Mineral originates from the Covered Countries, and if so, whether the mineral is conflict free, as set forth in our Supplier Code of Conduct.

For more information on our annual Conflict Minerals due diligence process, please refer to our Form SD as filed with the U.S. Securities and Exchange Commission.