



Owens Corning Code of Business Conduct

Ten Guiding Principles – Global

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Compliance Expectations

Compliance at Owens Corning means that we all follow our Ten Guiding Principles all of the time – NO EXCEPTIONS. Our Guiding Principles are designed to ensure that employees act with integrity and in an ethical manner, avoiding even the appearance of impropriety. Each guiding principle is supported by one or more Business Conduct Policies detailing compliance expectations.

This Code of Business Conduct applies to Owens Corning, all of its controlled domestic and foreign subsidiaries, and all other legal entities in which Owens Corning has the controlling interest (more than 50% ownership). These policies are made available to employees via Globalink home page (Company Policies > Business Conduct Website). The Business Conduct Council has oversight responsibility for worldwide compliance with these policies.

The Owens Corning Business Code of Conduct is designed to guide all of us on how to conduct business ethically and comply with all laws. It should be incorporated into the way all employees work every day, with customers, colleagues, suppliers and the public. Our Code of Conduct is an extension of our corporate values, and 100% compliance is an expectation of your employment at Owens Corning.

In furtherance of compliance, each employee has the following responsibilities:

- To always follow these **Ten Guiding Principles**:
 1. **Value Human Health and Our Environment:** Owens Corning is committed to environmental compliance and the principles of sustainability, product stewardship and personal safety.
 - Environmental Health, Safety & Product Stewardship
 2. **Act with Integrity:** All employees will conduct business with integrity, without corruption or bribery and will spend Owens Corning money in compliance with Gifts, Entertainment and Travel, and Political Contributions Guidelines.
 - Foreign Corrupt Practices
 - Gifts and Entertainment
 - Political Contributions
 - Travel, Entertainment and Expense
 3. **Treat Others Respectfully:** Owens Corning provides safe, fair and respectful working conditions and is free of unlawful discrimination or harassment.
 - Equal Opportunity
 - Non-Harassment
 4. **Compete Vigorously but Lawfully:** It is the responsibility of each employee to ensure that our efforts in the marketplace are conducted in accordance with the letter and spirit of applicable antitrust and competition laws.
 - Antitrust and Competition Laws



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5. **Honor Trade Restrictions:** Employees shall comply fully with all applicable laws and regulations in the countries where we do business, including U.S. embargoes, sanctions, export controls and restrictions on doing business with “denied parties.”

- Trade Restrictions

6. **Create a No Conflicts Culture:** All employees must avoid any activity that creates or appears to create a conflict between his or her interest and the interest of Owens Corning.

- Conflict of Interest

7. **Keep Accurate Records:** Making false or misleading entries or records is strictly prohibited. Making sure that Company records are maintained and managed according to policy and reflect the transactions of its business in an accurate, truthful and timely manner is imperative.

- Company Accounting Records
- Records Management

8. **Respect and Preserve Confidential Information:** Employees must safeguard and protect Company proprietary information, assets and resources. Avoid unauthorized disclosure of nonpublic information acquired in the workplace and the misuse of material nonpublic information in securities trading.

- Intellectual Property Protection
- Employee Compliance with Securities Laws

9. **Ensure that Commitments are Properly Made:** Contracts must be approved or executed in compliance with the Levels of Authority Policy.

- Levels of Authority

10. **Properly Use Company Electronic Systems:** Employees must strictly adhere to the Use of Electronic Systems policy and understand and follow the Acceptable Use Guidelines when using any Company electronic system.

- Use of Electronic Systems

- To not engage in any activity or conduct that the employee knows or should know may result in a civil or criminal liability for the employee or Owens Corning;
- To not engage in any activity or conduct that the employee knows or should know may result in embarrassment or loss of reputation for the employee or Owens Corning;
- To understand and follow all Business Conduct policies.



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Reporting, Corrective Action & Compliance Certification

Reporting

All employees benefit from an atmosphere promoting ethical conduct. If you believe that you have violated a Business Conduct policy or if you are aware of suspected misconduct, fraud, misuse of Company assets or other violations of the Business Conduct policies, you are responsible for reporting such matters to your manager, Human Resources representative or through the Company's confidential reporting system, the Business Conduct Helpline, at 1-800-241-5689, or elsewhere have the international operator place the call collect to 00-1-770-263-4741, or dial direct 00-1-770-263-4741. Other avenues of reporting include:

- Notification to OC Ethical Business Complaints, Office of the General Counsel 2-29, One Owens Corning Parkway, Toledo, OH 43659
- E-mail Ethical.business.complaints@owenscorning.com
- Business Conduct Council Member

Due to data protection laws, Owens Corning employees resident in European Union countries should utilize these business code of conduct reporting avenues to report matters associated with questionable accounting or auditing matters only. All other business code of conduct policy violations or related matters should be reported directly to the Human Resources leader in the employee's home country or the Human Resources divisional representative.

No employee shall be subject to any form of retribution for reporting potential violations of any business conduct policy or law.

Corrective Action

All employees world-wide are expected to comply with the Company's Code of Business Conduct and all applicable laws and regulations, rules, or standards, as well as practices and policies of the Company and its subsidiaries/affiliates. Managers are expected to uphold compliance with all Business Conduct Council or other Company policies and to address violations in a consistent manner. If an employee's action or inaction violates any of these policies or is otherwise deemed to be dishonest, unethical or unacceptable, that employee will be subject to disciplinary action up to and including termination. When in doubt, employees should contact their supervisor/manager, a Human Resources representative, a member of the Business Conduct Council or the BCC Helpline North America at 1-800-241-5689, or elsewhere call collect at 770-263-4741 to report a suspected violation. The foregoing notwithstanding, the Company shall comply with all local laws and the terms of any applicable collective bargaining agreement.

Employment At Will – U.S.

The fact that Owens Corning has and will continue to take disciplinary action for unacceptable conduct by its employees does not, and should not be construed to alter its status as an "at-will" employer. Unless covered by a collective bargaining agreement or law to the contrary, all employees' employment is at the will of Owens Corning and can be terminated with or without cause and with or without notice at the option of either the employee or Owens Corning.



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Referral for Prosecution

All matters coming to the attention of the Company, involving employee theft of Company assets or property shall be subject to criminal prosecution. Such matters shall be forwarded by the Director, Corporate Security to the applicable law enforcement agencies. No such referral is required in circumstances which would potentially jeopardize the identity/security of a confidential informant or otherwise compromise the Company's interests. Decisions made not to refer such matters for prosecution shall be approved by the Company's General Counsel.

If you believe that you have violated this policy, or you observe other Owens Corning employees in violation of this policy, you should report this to your supervisor/manager or Human Resources representative. If you do not feel comfortable reporting to these individuals, you should report violations of this policy to the Business Conduct Helpline in North America at 1-800-241-5689, or elsewhere have the international operator place the call collect to 770-263-4741, or dial direct 00-1-770-263-4741.

Annual Compliance Certification

Annually a business conduct policy awareness and certification program is conducted, with a notice provided to employees. The notice directs employees to review all Business Conduct policies and reminds them of their responsibilities, including reporting of situations that might be violations. Salaried employees certify to the Business Conduct Council that they are: (1) in compliance with all policies, (2) not aware of any possible violations, or (3) aware of and have reported to the Company any such violations.

This code of business conduct is a statement of the fundamental principles, key policies and procedures that govern the conduct of Owens Corning business. It is not intended to and does not create any rights in any employee, other person or entity.