



SUPPLIER CODE OF CONDUCT

Introduction

At Owens Corning, our responsible supply chain strategy is global in scope and human in scale. We are helping to shape a global supply chain centered on shared value by protecting the environment, caring for people, and empowering communities, while enhancing the competitiveness of our business.

To achieve this mission, Owens Corning recognizes the importance of collaboration with our suppliers to work together to achieve these shared values.

Fundamental to this approach, we are guided by the following principles which are the basis of our Supplier Code of Conduct:

1. Business is conducted ethically and with integrity in compliance with laws and regulations.
2. Everyone is treated equally with respect and dignity.
3. Human and labor rights, including the safety, health, and well-being of all workers, are respected.
4. Work is voluntary, done over reasonable hours by individuals of appropriate age.
5. Work is based on mutually agreed upon and documented terms of employment and all workers are paid fair wages.
6. Sustainability is integrated into business activities to reduce negative environmental and community impacts.
7. Implement management systems that govern performance and drive continuous improvement.

Purpose and Expectations

The Owens Corning Supplier Code of Conduct reflects our commitment to doing business with integrity. At Owens Corning, integrity means our conduct is true to our words; we adhere to the letter and spirit of all applicable laws, regulations, and policies. We pride ourselves in doing business ethically, avoiding even the appearance of impropriety and that our business partners share our ethical principles.

While Owens Corning understands and respects that there are different legal and cultural environments in which our Suppliers conduct their business, this Code provides a foundation to assist in contracting decisions and Supplier selection and provides a framework of minimum requirements by which to hold our Suppliers accountable.

Supplier Code of Conduct Scope

Requirements in this Code apply to all Suppliers including:

- Owens Corning's entire supply chain. This includes Suppliers that directly invoice Owens Corning for goods and/or services as well as sub-tier Suppliers, sub-contractors, and raw material providers.
- All types of Suppliers regardless of size and number of employees.
- All aspects of our Supplier's business including all divisions and operations.
- All Supplier employees including permanent, temporary, and agency workers, as well as piece-rate, salaried, hourly paid, legal young workers, part time, night, and migrant workers.

Requirements and Encouragements Incorporated into this Code

The requirements and encouragements within the Code have been developed to incorporate the principles of Owens Corning's Code of Conduct, associated policies, international standards, regulations, and conventions that are widely used and aligned with international norms on topics relating to human rights, protection of the environment, and labor practices. The Code outlines the expectations that we have regarding the operations of our Suppliers and contributes to our commitment to the OECD Guidelines for Multinational Enterprises, the Core Conventions of the International Labor Organization (ILO) and the United Nations Global Compact, Sustainable Development Goals and Guiding Principles for Business and Human Rights. A complete list of references used to develop the guiding principles and requirements in this document can be found in Appendix 1.

This Supplier Code of Conduct also includes encouragements, which are also connected to established international standards and conventions. We acknowledge these encouragements have set ambitious expectations to ensure vulnerable peoples and environments are protected and that today's expectations will become future requirements. We encourage suppliers to consider adopting policies related to the various encouragements detailed throughout the Supplier Code of Conduct.

By doing business with Owens Corning, it is a commitment by the Supplier that they will meet the requirements through the application of their own management systems including policies, processes, and procedures and it is incumbent upon the supplier to assess and monitor their own policies to ensure conformance to the Supplier Code of Conduct.

Monitoring Supplier Adherence

Suppliers will cooperate with any information requests by Owens Corning to confirm compliance with the requirements in this Code. Owens Corning can verify alignment to and achievement of our requirements using mechanisms such as self-declarations, due diligence screenings, on-site visits, online assessments, and verifications through third-party audits. Compliance with this Code will be evaluated by Owens Corning based on risk, including an assessment of size of Supplier, types of goods or services being supplied, country of operation and other data where required. Owens Corning reserves the right to terminate our relationship with any Supplier that fails to meet the requirements.

Reporting on Breaches

- Suppliers who recognize they are not meeting a requirement of the Owens Corning Supplier Code of Conduct will implement improvement actions according to severity of the requirement.
- All stakeholders including Suppliers, their workers and communities may report actual or suspected breaches of our Supplier Code of Conduct to our Business Conduct Helpline. Reports are confidential and can be submitted anonymously.
- Owens Corning will investigate concerns raised and engage Suppliers to review the concerns. Suppliers will assist in any such investigation and provide access to information requested.
- If remediation is required, Suppliers will develop and inform Owens Corning the corrective actions and mitigation plans to resolve the breach and timeline to implement.

Contact Information

Should you have any questions or require a hardcopy version of this Code, please refer to <http://owenscorning.com> or write to this email address:

suppliercodeofconduct@owenscorning.com

An independent line of communication is provided for Suppliers to address infractions or the inability to adhere with this Supplier Code of Conduct due to the actions of an Owens Corning employee through the independent Business Conduct Help Line at +1-800-461-9330 or <http://helpline.owenscorning.com>.

Document History

Owens Corning is dedicated to the continuous improvement of this Code. The Code will be modified and/or updated accordingly following any significant change in law or regulation impacting our operations in any country around the world, or in such cases where Owens Corning believes it is necessary.

- Version 1.0: Released June, 2010
- Version 2.0: Released June 2012
- Version 2.1: Released March, 2013
- Version 3.0: Released June, 2016
- Version 4.0: Released March, 2019
- Version 5.0: Released Nov, 2024

Business Integrity and Ethics

Suppliers are expected to behave ethically and with integrity in all business transactions.

1. Legal Compliance

Suppliers will comply with all laws and regulations.

- 1.1. Suppliers will comply with, and operate within the spirit of, all applicable legislation, laws, regulations, and legal requirements including but not limited to: human rights, labor, the environment, anti-corruption, and trade and customs.
- 1.2. Suppliers will protect Owens Corning's intellectual property and other confidential information and will not share it with third parties without our express written permission or to engage in unlawful insider trading activities.
- 1.3. Suppliers will respect Owens Corning intellectual property rights and safeguard the privacy of Owens Corning's employees and its customers and others.
- 1.4. Suppliers will comply with country-specific or local legislation, the international norms explicitly referenced in the Code, or Owens Corning's-specific standards, whichever standard is higher. Should conflicts arise between local legislation and international norms or Owens Corning-specific standards, the Supplier is expected to notify Owens Corning.
- 1.5. Suppliers and contractors will not use publicly available third-party artificial intelligence (AI) systems to process company proprietary or confidential information or build AI protocols.

2. Anti-Corruption

Suppliers will have zero-tolerance to corruption.

- 2.1. Suppliers will conduct their obligations with integrity and comply with all Anti-Corruption laws, including but not limited to the United States Foreign Corrupt Practices Act of 1977 (FCPA), the UK Bribery Act, and the OECD Convention on Combating Bribery.
- 2.2. Suppliers will not directly or indirectly offer, pay, promise to pay, or authorize the payment of any money, or offer, give, promise to give, or authorize the payment of any money, or anything else of value to any person, including any official or employee of any government, or any person acting in an official capacity for or on behalf of any such government to influence an official act or omission; to secure an improper advantage; or to obtain or retain business.
- 2.3. Suppliers will not make facilitating (or facilitation of) payments on Owens Corning's behalf.

3. Conflicts of Interest, Gifts and Entertainment

Suppliers will avoid conflicts of interest of all types - in practice or in appearance.

- 3.1. Suppliers must respect the limitations placed on Owens Corning employees to avoid any relationship, influence, or activity that might impair, or appear to impair, Owens Corning's ability to make objective business decisions.
- 3.2. Suppliers will not entertain solicitations from an Owens Corning employee for any gift, or entertainment, or favor of any value.
- 3.3. Suppliers will promptly inform Owens Corning of any potential or actual solicitations for any gift, entertainment, or improper payment through the Owens Corning helpline.

4. Antitrust & Competition Laws

Suppliers will uphold fair business practices related to antitrust and competition laws.

- 4.1. Suppliers will conduct their business in full compliance with antitrust and fair competition laws that

- govern the jurisdictions in which Suppliers conduct their business.
- 4.2. Suppliers must not engage in illegal cooperation with competitors including bid rigging, price fixing, market allocations, or any other prohibited conduct that limits free and fair competition. Suppliers will also accurately reflect their business dealings in their books and records.

5. Trade and Import Restrictions

Suppliers will comply with trade and import laws and regulations.

- 5.1. Suppliers will comply with all trade laws and customs regulations in the countries where they do business including country of origin labeling, country embargoes, export controls, and restrictions on doing business with sanctioned entities.

Aligned with our requirements on Trade and Import, Suppliers are encouraged to:

Represent and warrant that they are validated members of the United States Customs-Trade Partnership Against Terrorism (C-TPAT) program, or if they are not members, that they shall comply with all relevant C-TPAT Minimum Security Criteria. (See appendix for link to CBP website)

6. Sourcing and Physical Goods Supply

Physical goods Suppliers will source and provide goods and services responsibly and according to agreed specifications.

- 6.1. Suppliers will ensure all products, materials and services supplied to Owens Corning meet agreed specifications including quality, performance, and safety requirements.
- 6.2. Suppliers will share information on the performance and safe use of their products and services.
- 6.3. Suppliers will map and continuously monitor all the owned and/or subcontracted farms, mills, plants, factories, mines, and other sites that participate in the production of any products sold to Owens Corning and provide this information to Owens Corning if required.
- 6.4. Suppliers will maintain their own policy, code, or similar document with equivalent principles to the Owens Corning Supplier Code of Conduct for their own suppliers.
- 6.5. Suppliers will demonstrate environmental and human rights due diligence by systematically identifying, preventing, mitigating, and accounting for potential and actual negative impacts that may arise from their activities or be directly linked to their operations, products, or services through business relationships.
- 6.6. Suppliers will verify that all raw materials (i.e., wood and minerals) used to manufacture any products sold to Owens Corning are sourced in compliance with all applicable laws, rules and regulatory requirements and, where applicable, comply with Owens Corning's Conflict Mineral Policy and Responsible Wood Sourcing Policy.
- 6.7. Suppliers will implement a risk assessment (supply chain mapping) of all high-risk products, including conflict minerals.
- 6.8. Suppliers will develop an appropriate risk mitigation strategy for those Suppliers identified as "high-risk" in the supply chain mapping exercise.

Owens Corning encourages the Supplier to join or build partnerships with industry organizations implementing due diligence in the mineral supply chain.

Human Rights and Fair Labor Practices

Suppliers will uphold the human rights of workers and treat them with dignity and respect. Suppliers will comply with applicable human rights and labor laws, regulations and legal requirements including:

7. Equality, Respect and Dignity

All workers are treated equally with respect and dignity without any form of discrimination.

- 7.1. There will be no discrimination in any aspect of the employment relationship (recruitment, training, development, compensation, advancement, discipline, termination, retirement).
- 7.2. Suppliers will provide equal employment opportunities to all candidates and employees, to make employment decisions that are free from bias, and to provide a workplace free from discrimination.

8. Free from Harassment and Abuse

All workers are entitled to an environment free of harassment and abuse.

- 8.1. Workers have a right to an environment free from harassment and abuse, including, but not limited to, sexual and physical harassment and psychological, verbal, and physical abuse.
- 8.2. Suppliers will commit to zero tolerance to all types of harassment.
- 8.3. Document, communicate, and train on disciplinary measures and are applied consistently to all employees for harassment prevention.
- 8.4. There is zero tolerance for retaliation of people who speak up to report harassment incidents.

9. Prohibit the use of Child Labor

All workers must be sixteen years old, and all young workers are protected.

- 9.1. No person shall be employed under the age of sixteen (16), or the age for completing compulsory education in that country, whichever is higher.
- 9.2. Young workers (ages 16-17) will not perform high-risk work which, by its nature or the circumstances in which it is conducted, is mentally, physically, socially, or morally dangerous or harmful or interferes with their opportunity to attend school, including working nightshifts or overtime.
- 9.3. Young workers will have formal work contracts and will be compensated fairly for their work.
- 9.4. If child labor or mistreatment of young workers is identified, immediate remediation is required by the Supplier.

10. Combating Modern Slavery

Employment by all workers is conducted on a voluntary basis and mutually accepted terms.

- 10.1. Suppliers will not employ forced, slave, convict, trafficked or bonded labor.
- 10.2. All work must be voluntary, and all workers must be free to terminate their employment at any time.
- 10.3. Suppliers are required to monitor any third-party entity which assists them in recruiting or hiring employees, to ensure that people seeking employment at their facility are not compelled to work through force, deception, intimidation, coercion or as a punishment for holding or expressing unique ideological views.
- 10.4. Suppliers are required to pay for any recruitment fees or any other related costs for the employment of workers.

11. Fair Compensation

Workers are paid fair wages.

- 11.1. Workers are provided compensation packages that includes wages, overtime pay, benefits and paid leave which meets or exceeds the legal minimum standards.
- 11.2. Compensation terms are documented, and collective bargaining agreements that are

implemented are adhered to.
11.3. Worker's wages are paid, on-time, regularly and in full, and are fully documented indicating the components of the compensation.

12. Reasonable Hours of Work

Working hours for all workers is reasonable.

- 12.1. Workers are only able to work the regular and overtime hours allowed by the law of the country where employed.
- 12.2. Employee working hours and pay records must be documented.

13. Freedom of Assembly and of Association

Workers have the right to form or join a labor union.

- 13.1. All workers can seek representation and collectively bargain without coercion, interference, retaliation, or harassment.
- 13.2. Suppliers will allow for alternative means of worker representation, organization.

14. Land Rights

Individuals and local communities, including Indigenous Peoples, have their property and land rights and titles fully respected.

15. Access to Grievance Mechanisms and Remedies

Suppliers will maintain mechanisms to address employee grievances and resolve disputes.

- 15.1. Suppliers will provide employees with the ability to address grievances and resolve disputes.
- 15.2. Suppliers will formally document and communicate the grievance management process.
- 15.3. Suppliers will align their grievance mechanism with the effectiveness criteria in the UN Guiding Principles on Business and Human Rights, ensuring their systems are legitimate, accessible, predictable, equitable, transparent and rights compatible.
- 15.4. Suppliers will ensure grievance mechanisms are confidential, protect the complainant's privacy and allow for anonymous reporting of grievances. The mechanisms need to protect against retaliation and ensure grievances are responded to in a timely manner.
- 15.5. Suppliers will ensure the grievance mechanism is overseen by an appropriate level of management and employees are trained on the grievance management process.

Aligned with our requirements on human rights and fair labor practices, Suppliers are encouraged to:

- **Equality, Respect and Dignity**
 - Promote and improve a culture of inclusion and diversity through all aspects of workplace management.
- **Fair Compensation**
 - Hold insurance to cover workers in the case of any work-related injuries, accidents, illness, invalidity, and death in accordance with local worker compensation laws, as a minimum.
- **Reasonable Hours of Work**
 - A work week must not be more than 60 hours per week including overtime.
 - Workers will be allowed at least one day off every seven days.
 - All overtime work must be voluntary.

- **Access to Grievance Mechanisms and Remedies**
 - Investigate grievances to identify root causes and make operational improvements where appropriate.
 - Communicate grievance mechanisms to external stakeholders such as local communities.
- **Land Rights**
 - Suppliers not to participate in any form of land grabbing.
 - Suppliers will actively seek and document the effective implementation of free, prior, and informed consent (FPIC) during any land acquisition, land-use planning, or land development process.
 - Suppliers will assess environmental and social impacts prior to changes in land use and affected communities will be engaged.

Health and Safety

Suppliers will aim to prevent accidents, injury and illness linked to work and protect workers.

16. Worker Health and Safety

Suppliers will aim to prevent accidents, injury and illness linked to work and protect workers.

- 16.1. Suppliers will comply with applicable health and safety laws, regulations, and legal requirements that protect employee's health and safety at work.
- 16.2. Suppliers shall have procedures and systems to manage, track and report occupational injuries and illnesses and exposure of workers to chemical, biological, and physical agents. These procedures and systems shall encourage worker reporting, (ii) classify and record injury and illness cases, (iii) investigate cases, and (iv) implement corrective actions.
- 16.3. Suppliers will establish, communicate, and regularly update occupational health and safety policies and procedures to maintain a safe, clean, and healthy work environment.
- 16.4. Suppliers will provide adequate knowledge and personal protective equipment to workers to avoid harm and ensuring appropriate health and safety signage is in place.
- 16.5. Suppliers will maintain emergency response procedures and egress options to minimize harm to life, the environment and property.
- 16.6. Suppliers will ensure structural integrity and fire safety of work sites are regularly assessed and identified issues are addressed.
- 16.7. Suppliers will ensure safe handling, movement, storage, recycling, reuse, and disposal of materials to prevent impacts to health and safety of people.
- 16.8. Suppliers will provide all workers easy access to free potable drinking water and providing clean, fully serviced lavatories with hand washing facilities with running water and soap.
- 16.9. If worker accommodations are provided by Suppliers, they will ensure facilities are clean, safe, provide adequate emergency egress and meets the basic needs of the workers, including adequate heat and ventilation, adequate privacy, access to clean sanitary facilities, potable water, and food storage.

Aligned with our requirements on health and safety, Suppliers are encouraged to:

- Establish goals to achieve zero accidents.
- Monitor and report on health & safety performance.
- Create a health and safety culture aligned with Owens Corning's identity of "Safer

Together.”

- Adopt and maintain health and safety practices that include mental wellbeing.

The Environment

Suppliers will aim to prevent negative impacts and increase positive impacts to the natural environment of their operations and products.

17. Reducing Environmental Impacts

Suppliers will conduct business through an approach that embraces sustainability and increases positive impacts on the environment.

- 17.1. Suppliers will comply with applicable environmental laws, regulations, and legal requirements to protect nature, protect communities, combat climate change, and reduce waste.
- 17.2. Suppliers will obtain and maintain required environmental permits, approvals, and registrations and following operational and reporting requirements for topics related to the protection of the environment including nature, biodiversity, water, air, waste, and greenhouse gas emissions management.
- 17.3. Suppliers will identify, manage, and reduce substances that pose a hazard if released to the environment.
- 17.4. Suppliers will store, handle, transport, and dispose waste in a way that protects the health and safety of people and protects the environment.

Aligned with our environmental requirements, Suppliers are encouraged to:

- Suppliers will report environmental performance and provide footprint data for products sold.
- Establish goals and monitor the reduction of their environmental footprint, and to minimize environmental impacts in local communities.
- Establishment of an environmental management system (EMS) to mitigate adverse environmental impacts, fulfill compliance obligations, enhance environmental performance, and communicate information to relevant stakeholders. Where possible certify operations or align management systems to international standards for environment, safety, and energy such as ISO 14001, ISO 45001, and ISO 50001.
- Embed sustainability practices across their operations that aim to:
 - Reduce the generation of waste and achieve zero waste to landfill.
 - Reduce greenhouse gas emissions and implement carbon neutral solutions.
 - Reduce the consumption of water.
 - Protect and enhance nature and biodiversity.

Appendix 1 - References

The requirements in this code are rooted in international standards, regulations and conventions that are widely used and aligned with similar expectations by other companies. Below is a non-exhaustive list of references or supporting information supporting the foundational principles and requirements of this code.

- United Nations Global Compact
 - www.unglobalcompact.org

- Owens Corning Code of Conduct
 - <http://www.owenscorning.com/acquainted/governance/ethics.asp>
- United Nations Environment Programme
 - <http://www.unep.org/>
- Universal Declaration of Human Rights (UDHR)
 - <http://www.un.org/en/documents/udhr/>
- UN Guiding Principles on Business and Human Rights
 - www.unglobalcompact.org/library/2
- International Labour Organization's (ILO) Core Conventions (No. 29, 87, 98, 100, 105, 111, 138, 182) and Labor Standards and ILO Declaration on Fundamental Principles and Rights at Work
 - <http://www.ilo.org/global/lang-en/index.htm>
- Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery
 - <https://www.ohchr.org/EN/ProfessionalInterest/Pages/SupplementaryConventionAbolitionOfSlavery.aspx>
- Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime
 - <https://www.ohchr.org/EN/ProfessionalInterest/Pages/ProtocolTraffickingInPersons.aspx>
- OECD Convention on Combating Bribery of Foreign Officials in International Business Transactions
 - <http://www.oecd.org/corruption/oecdantibriberyconvention.htm>
- United States Department of Justice – Foreign Corrupt Practices Act
 - <http://www.justice.gov/criminal/fraud/fcpa/>
- UK Bribery Act 2010
 - <https://www.legislation.gov.uk/ukpga/2010/23/contents>
- OECD Due Diligence Guidance for Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
 - <https://www.oecd.org/daf/inv/mne/mining.htm>
- U.S. government lists of such “specially designated nationals” and “blocked persons”
 - <http://www.treas.gov/offices/enforcement/ofac/sdn/>
- C-TPAT and US Customs and Border Protection Minimum Security Criteria
 - [CTPAT U.S. Importers MSC 2021 | U.S. Customs and Border Protection \(cbp.gov\)](http://www.cbp.gov/CTPAT_U.S._Importers_MSC_2021)
- Ethical Trading Initiative
 - <https://www.ethicaltrade.org/>
- Business Principles for Countering Bribery produced by Transparency International:
- United States Foreign Corrupt Practices Act of 1977 (FCPA), the UK Bribery Act, and the OECD Convention on Combating Bribery.

Appendix 2 - Definitions:

Child Labor - work or service extracted from anyone under the age of sixteen (16), the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher.

Convict labor – any labor performed by a legally convicted person on or outside of prison grounds as per the Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to

Slavery under Articles 1 and 7.

Facilitating (or facilitation of) payments - A small bribe, also called a 'facilitating', 'speed' or 'grease' payment; made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.

Forced labor- any work or service not voluntarily performed and extracted from an individual under the menace of penalty and/or subject to unduly burdensome conditions such as, but not limited to, the surrender of government-issued identification, passports, or work permits, or any other limitations inhibiting the employees free will with respect to work.

Supplier- any organization or entity that directly provides goods and/or services to Owens Corning, including sub-suppliers, sub-contractors, and raw material providers.

Worker - any permanent, temporary, and agency workers, as well as piece-rate, salaried, hourly paid, legal young workers, part time, night, and migrant workers.

Young Worker- work or service extracted from anyone age of sixteen (16) to seventeen (17) years old.
