



OWENS CORNING HUMAN RIGHTS POLICY

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INTRODUCTION

Owens Corning is committed to respecting all the human rights of people where we operate and throughout our value chain to ensure that they are treated with dignity and respect. We believe that treating people with dignity and respect is essential to building a sustainable and inclusive business.

Our commitment to human rights is guided by the United Nations Guiding Principles (UNGPs) on Business and Human Rights and is grounded in internationally recognized frameworks, including:

- [The Universal Declaration of Human Rights](#), including:
 - The International Covenant on Civil and Political Rights
 - The International Covenant on Economic, Social and Cultural Rights
- [The International Labor Organization's \(ILO\) Declaration on Fundamental Principles and Rights at Work](#)
- [OECD Guidelines for Multinational Enterprises](#)

As part of our ongoing dedication to responsible business practices, Owens Corning is a proud signatory of the [United Nations Global Compact](#). We strive to integrate these principles into our culture, policies, and everyday operations to help ensure that human rights are respected and advanced wherever we do business.

SCOPE

Owens Corning's Human Rights Policy applies to the entities that we own, the entities in which we hold a majority interest (including joint ventures), facilities that we manage and franchises or branded operations, as well as all employees (full time, part time, agency or contractors). We also expect our business partners to respect human rights and to act in line with global human rights frameworks.

We take steps to actively embed our Human Rights commitments and principles into the policies and processes throughout our business. Human rights considerations also exist in the Owens Corning Code of Conduct. The Owens Corning Supplier Code of Conduct aligns with the expectations and commitments in this Human Rights Policy and serves as a reference point in the sourcing selection process. Our business partners are provided with our human rights policy as part of onboarding and requirements are incorporated into supplier contracts.

As part of our commitment to inclusion and diversity, Owens Corning respects the rights of vulnerable groups who may face greater risks of harm or have limited access to support and remedies, including but not limited to migrant workers, women, children, elderly and disabled. When applying our policy and where national law and international human rights standards differ, we will follow the higher standard; when faced with conflicting requirements, we will adhere to national law, while seeking ways to honor the principles of internationally recognized human rights. This policy provides a framework of minimum requirements to hold our company and our business partners accountable.

GOVERNANCE AND RESPONSIBILITIES

Embedding respect for human rights within our organization starts at the top and requires collaboration amongst several groups to be successful. Ownership and responsibilities reside in various functions from Human Resources to Legal, Sourcing, and Sustainability. Accountability lies with senior leadership including roles such as Chief Sustainability Officer and Chief Administrative Officer and General Counsel for implementing human rights management processes including risk-assessments, audits, and training. These roles report directly to the CEO and are responsible for our compliance with legal and company requirements including those related to environmental, safety, health, and sustainability.



WE BELIEVE THAT TREATING PEOPLE WITH
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OUR PRIORITY FOCUS AREAS

We are committed to respecting internationally recognized human rights throughout our operations in line with the UNGPs. We place specific efforts on those rights that are at risk of the most severe negative impact through our activities and business relationships. We conduct enterprise level human rights risk assessments and prioritization, internal and external stakeholder engagement, and ongoing due diligence to identify human rights priority focus areas. Our highest priority (salient) topics are:

- Forced labor, modern slavery and human trafficking
- Child rights, child labor, and juvenile work
- Workplace health and safety
- Working conditions
- Discrimination and harassment
- Community rights and engagement
- Indigenous Peoples’ rights and land rights
- Clean, healthy, and sustainable environment
- Privacy for employees and stakeholders
- Bribery and corruption
- Freedom of association and collective bargaining
- Access to grievance mechanisms and remedy

OUR COMMITMENTS

Owens Corning makes the following commitments to respect human rights. The following commitments are based on the salient human rights topics we have identified in our operations and across our value chain. Our respect for human rights is not limited to these topics.

General

- Owens Corning employees and our business partners are expected to share our commitment to respect human rights and will comply with applicable laws and company policies.
- Owens Corning does not tolerate threats, intimidation, or attacks against human rights defenders in relation to our operations and business relationships.

Forced Labor, Modern Slavery, and Human Trafficking

- Owens Corning does not and will not employ forced, slave, convict, or bonded labor. In addition, Owens Corning will not knowingly engage a supplier or distributor, or enter a joint venture with an organization, that directly or indirectly, employs forced labor or employs persons who were trafficked into employment.

Child Labor and Young Workers

- Owens Corning does not and will not employ child labor. In addition, Owens Corning will not knowingly engage a supplier or distributor, or enter a joint venture with an organization, that directly or indirectly, through a third party, employs child labor.
- Owens Corning supports employment of young workers (age 16-17) if they are part of an approved workplace apprenticeship program and comply with all applicable laws. Young workers are only allowed to conduct low-risk, supervised work during day-time hours that do not impact their ability to attend school or constitute overtime. All young workers will have formal work contracts and will be compensated fairly for their work.

Workplace Health and Safety

- Owens Corning commits to provide safe, secure working conditions and workplaces that promote the health and well-being of our employees, business partners and communities where we operate. Our commitment is outlined in our Environmental, Health, Safety & Product Stewardship Policy.

Working Conditions

- Owens Corning provides employees with compensation benefits and working hour schedules in compliance with all applicable laws and collective agreements. Owens Corning provides advanced notice and balance of work schedules on a regular basis.
- Owens Corning commits to fairly compensate at or above all established minimum wage requirements. Owens Corning will compensate “equal pay for equal work” and will remediate all identified and substantiated pay gaps through pay increases.
- Owens Corning will compensate overtime work at the appropriate rate required by local law, and all wages will be paid on time and in full. All employees will receive a pay statement for each pay period that clearly outlines the components of their compensation, including hours worked, benefits received, and any deductions. We prohibit deduction of earned wages as a disciplinary measure and require that all deductions be made in accordance with local law.
- Owens Corning will provide mechanisms for employees to report grievances and ensure resolution of disputes that protects the employee's privacy, allows for anonymous reporting, and protects the employee against retaliation.
- Owens Corning will respect our employees' right to join labor organizations or to not join such organizations, and the freedom to bargain collectively as determined by the employees themselves without coercion, interference, retaliation, or harassment, in compliance with all applicable laws and promote the right to freedom of association. We are committed to establishing a constructive dialogue and bargaining in good faith with such representatives. Owens Corning also allows alternative means of worker representation, organization, ability to address grievances and resolve disputes, if desired by employees.

Discrimination and Harassment

- Owens Corning is committed to provide equal employment and advancement opportunities to all individuals, where employment decisions are based on merit, qualifications, and abilities. Owens Corning does not discriminate in employment opportunities or practices and will ensure employment and advancement opportunities are evaluated without the regard to race, color, religion, national origin, age, disability, veteran or military status, pregnancy status, sex, gender identity, sexual orientation, marital status, genetic information, or any other characteristic protected by applicable law.
- Owens Corning will not tolerate acts of discrimination (which includes harassment) and will provide a work environment free from harassment on any basis. No hardship, loss of benefits, nor penalty may be imposed on an employee as punishment for filing a good faith complaint of discrimination or responding to a complaint of discrimination, appearing as a witness in the investigation of a complaint, service as an investigator or otherwise cooperating in a workplace investigation. Retaliation or attempted retaliation is a violation of this Policy and anyone who engages in retaliatory behavior may be subject to discipline, including termination. For more information see the [Owens Corning Code of Conduct](#).

Community Engagement

- Owens Corning is committed to respecting the rights, interests, concerns, and development aspirations of the communities where we operate. We comply with all regulatory requirements regarding consultation and social impact assessments, and we are dedicated to listening to and addressing concerns raised by community members and we commit to providing appropriate channels for feedback.
- Owens Corning commits to being proactive in the communities in which we live and work through supporting community-based initiatives and engaging local workforce and businesses.
- Owens Corning will continue to support and participate in collaborative multi-stakeholder initiatives that address the root causes of human rights issues and are able to influence positive systemic and lasting change.
- Owens Corning commits to conduct our activities with special attention to the rights of Indigenous Peoples aligned with ILO Convention No. 169 on Indigenous and Tribal Peoples and the United Nations Declaration on the Rights of Indigenous Peoples, and to work to minimize negative impact to the extent possible. We commit to free, prior and informed consultation processes in all of our activities which may impact Indigenous Peoples.
- Owens Corning will not participate in land grabbing and will assess environmental and social impacts prior to changes in significant operational changes.



Environmental Protection

- Owens Corning is committed to minimize the environmental impact of our operations and products over their lifecycle and support a clean, healthy, and sustainable environment. We apply measures in our own operations and expect our business partners to do the same through our Supplier Code of Conduct to protect nature (including water), protect communities, combat climate change, and reduce waste. We perform due diligence before launching a new product or modifying any manufacturing processes and commit to provide products that are safe and environmentally sound to make, use, and dispose of and that perform as claimed. See the [Environmental, Health, Safety & Product Stewardship Policy](#).

Privacy for Employees and Stakeholders

- Owens Corning complies fully with all applicable data privacy laws which it is subject to in the countries where it does business and is committed to collect, process and transfer personal data responsibly and in accordance with the principles and obligations set forth in the Data Privacy Policy unless it conflicts with stricter requirements of local law, in which case local law will prevail. Due to the differences in applicable laws, Owens Corning has implemented this Policy which adopts core principles and applies worldwide.

OUR APPROACH

Due Diligence

Owens Corning undertakes ongoing due diligence to identify, prevent, mitigate, and account for actual or potential adverse impacts on human rights in our operations and throughout our business relationship. Owens Corning's Supplier Code of Conduct also requires suppliers to demonstrate environmental and human rights due diligence. Where impacts are identified, Owens Corning will provide for or co-operate in remediation where required. Owens Corning utilizes several mechanisms to assess potential and actual impacts on the environment and society including audits, risk assessments, surveys, and impact assessments.

Remedy

We are committed to providing effective resolution where we have caused or contributed to adverse human rights impacts. Where we find adverse human rights impacts directly linked to our business relationships, we use our influence to encourage our suppliers or business partners to prevent, mitigate and address those harms. We require our suppliers to provide transparent, fair, and confidential grievance mechanisms for workers and encourage them to provide remedy where they have caused or contributed to an impact.

Capability Building

Every Owens Corning employee has a role to play in delivering on our commitment to respect human rights. All new and current employees are required to complete Code of Conduct training, which covers human rights themes. In addition, employees with roles and responsibilities relevant to aspects of human rights in our operations or in our supply chain receive general awareness trainings on human rights topics.

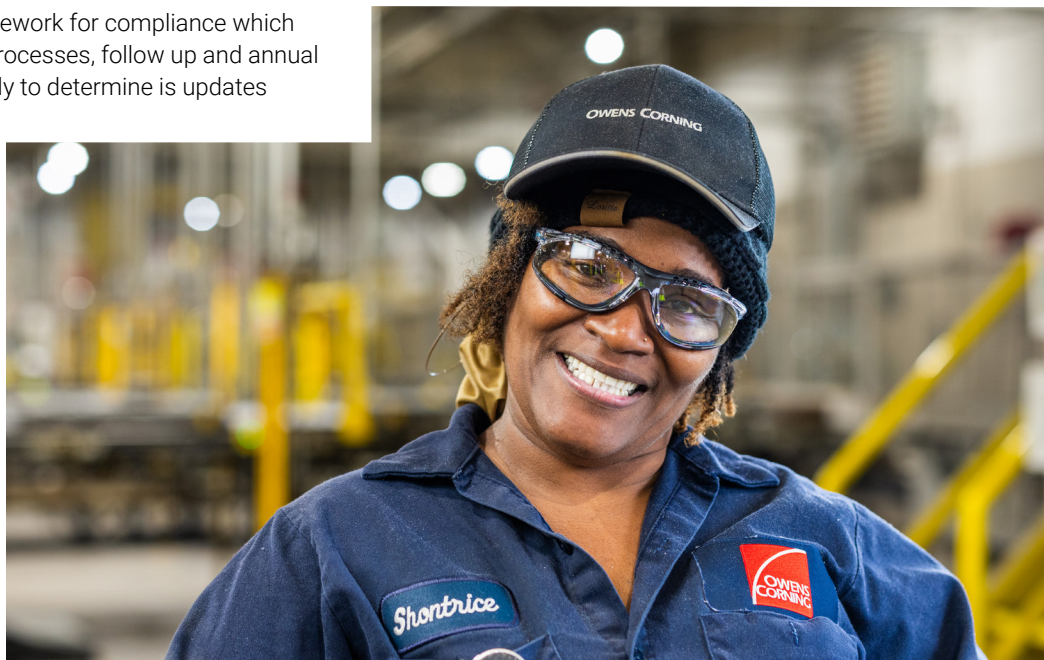
Raising Concerns

We invite stakeholders to communicate with us on any economic, environmental, or social topic related to our business. Owens Corning leverages a variety of channels to receive feedback from stakeholders including several options available on our website to submit questions or concerns related to company products and activities. Stakeholders can submit their concerns of potential misconduct (anonymously, if desired) to our Ethics and Compliance Committee through a confidential Helpline (1-800-461-9330) or web portal which are operated by a third-party service provider.

Reporting

This policy will be implemented under a framework for compliance which includes training, continuous improvement processes, follow up and annual reporting. This policy will be reviewed annually to determine if updates are required based on results of on-going human rights assessments, due diligence, and regulation.

In fulfilling our responsibility to respect human rights, we are committed to implementing this Policy throughout our business in line with the UN Guiding Principles on Business and Human Rights and to regularly reporting on our progress in line with the UN Guiding Principles Reporting Framework.



REFERENCES

UN Guiding Principles on Business and Human Rights.

- http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

UN Global Compact Human Rights and Business Learning Tool

- <http://human-rights-and-business-learning-tool.unglobalcompact.org/site/>

United Nations Global Compact

- www.unglobalcompact.org

Owens Corning Code 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 Declaration on the Rights of Indigenous Peoples

- https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf

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>

DEFINITIONS

- **Business Partner:** Any organization or entity that directly provides goods and/or services to Owens Corning, including sub-suppliers, sub-contractors, and raw material providers.
- **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. The definitions of slave and bonded labor as defined by Owens Corning are reflected in the Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery under Articles 1 and 7.
- **Forced Labor:** In accordance with Article 2 of the ILO Forced Labor Convention No. 29, Owens Corning defines "forced labor" as 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.
- **Human Rights:** Human rights are the fundamental rights, freedoms, and standards of treatment that are internationally recognized as belonging to all human beings by virtue of being human. Fundamental human rights are found in the United Nations Declaration on Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social, and Cultural Rights, the eight core ILO Conventions, and various covenants and treaties that implement these principles.
- **ILO Conventions:** The Freedom of Association and Protection of the Rights to Organise Convention, 1948; the Right to Organise and Collective Bargaining Convention, 1949; the Forced Labour Convention, 1930; the Abolition of Forced Labour Convention, 1957; the Minimum Age Convention, 1973; the Worst Forms of Child Labour Convention, 1999; the Equal Remuneration Convention, 1951; and the Discrimination (Employment and Occupation) Convention, 1958.
- **International Labour Organization (ILO):** The International Labour Organization is the international organization under the United Nations responsible for developing and overseeing international labor standards. It is the only United Nations agency that brings together representatives of governments, employers and workers to jointly shape policies/programs promoting decent work for all.
- **United Nations Global Compact (UNGC):** The UN Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labor, environment and anti-corruption. The Global Compact exists to assist the private sector in the management of increasingly complex risks and opportunities in the environmental, social and governance realms, seeking to embed markets and societies with universal principles and values for the benefit of all.
- **Universal Declaration of Human Rights (UDHR):** The Universal Declaration of Human Rights was proclaimed by the United Nations General Assembly in 1948. It contains 30 human rights that are expected to be universally respected and protected.
- **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 and subject to Articles 6 and 7 of the ILO Minimum Age Convention No. 138.



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