



# MINERALS SOURCING POLICY

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## Introduction

Owens Corning ("OC") is committed to conducting its business in an ethical and responsible manner. As part of this commitment, we recognize the importance of responsible sourcing, extraction, transportation, and trade of minerals and are dedicated to ensuring our global supply chain does not contribute directly or indirectly to armed conflict, human rights abuses, corruption, money laundering or environmental degradation in the development of any of OC products.

OC understands that certain minerals predominantly originate from Conflict Affected and High-Risk Areas ("CAHRA"), including the Democratic Republic of Congo ("DRC") and its adjoining countries, where there are heightened concerns that proceeds from minerals that could be used to contribute to armed conflict or human rights abuses.

OC supports the goal of preventing CAHRA whose natural resources include minerals which are in high demand, either locally, regionally, or globally from benefiting from the sourcing, production, and distribution of mined products containing any Conflict Minerals. OC does not source any Conflict Minerals from mines, smelters, or refiners.

By adopting this Minerals Sourcing Policy ("Policy") and collaborating with our customers and suppliers, OC is working to promote responsible business practices consistent with OC values. This Policy is aligned with and supports OC's Human Rights Policy, Code of Conduct, Supplier Code of Conduct, and overall respect for human rights in our own operations and our supply chains, as well as with the Organization of Economic Cooperation and Development ("OECD"), Due Diligence Guidance, and United Nations Guiding Principles.

## Minerals Sourcing Policy Scope

This Policy applies to the selection and retention of all Owens Corning suppliers that provide minerals or product containing mined materials, with specific focus on tin, tantalum, tungsten, and gold "Conflict Minerals" as well as the extended mineral derivatives of cassiterite, columbite tantalite, and wolframite (also known as 3TG).

## Guiding Principals

### Responsible Sourcing

- OC will only source minerals from suppliers who are in compliance with the OECD.

### Traceability and Due Diligence

- OC has procedures to trace the source of Conflict Minerals in our supply chain and conduct due diligence to ensure they do not originate from or are transported through CAHRA.

### Supplier Engagement

- OC requires our suppliers to comply with our conflict-free sourcing standards.

### Risk Assessment

- OC will conduct risk assessments and periodic reviews for continuous improvement to identify and mitigate areas where Conflict Minerals may enter our supply chain or where minerals are not being responsibly sourced.

## High-Risk Area Prohibition

- OC prohibits the transportation of products through high-risk areas known to be associated with armed conflict, human rights abuses, or any action that negatively affects the environment. Suppliers must ensure that products do not pass through or originate from such regions.

## Reporting

- OC will file an annual public report detailing our efforts to maintain a conflict-free supply chain in accordance applicable laws and regulations.

## Legal Compliance

- OC will comply with all relevant international laws and regulations pertaining to conflict minerals, including those of the countries in which we operate.

## Non-Compliance

- OC reserves the right to evaluate the extent to which a supplier has failed to comply with this Policy and can request additional documentation from its suppliers regarding the origin of any Conflict Minerals included in any products sold to OC. Non-compliance with this Policy may result in termination of contracts or business relationships with suppliers or partners.

## Our Commitment

OC commits to help our suppliers understand the due diligence steps they can take to identify, manage, report on risks, and investigate the source of any conflict minerals in the products they sell to OC including:

- Identifying and assessing risk in the supply chain;
- Responding to identified risks;
- Conducting an independent third-party audit of supply chain due diligence; and
- Reporting annually on supply chain due diligence.

Not source from a supplier any product that contains Conflict Minerals if OC determines the product is not conflict free; and utilize publicly available resources such as the Conflict Minerals Template ("CMRT") and the Extended Minerals Template ("EMRT") to gather information about the presence and origin of Conflict Minerals in our supply chain.

## What We Require of Our Suppliers

OC requires that our suppliers:

- Only supply materials to OC that are "conflict-free," meaning minerals that are from recycled or scrap sources or that do not directly or indirectly finance armed groups through mining or mineral trading in the DRC, adjoining countries or any other CAHRAs as determined by regulatory areas where we operate.
- 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.
- Verify that all raw materials (i.e., wood and minerals) used to manufacture any products sold to OC are sourced in compliance with all applicable laws, rules, and regulatory requirements.
- Implement a risk assessment (supply chain mapping) of all high-risk products, including conflict minerals.
- Develop an appropriate risk mitigation strategy for those Suppliers identified as "high-risk" in the supply chain mapping exercise.
- Train appropriate personnel on their responsible minerals policy.
- Cooperate with OC in evaluating compliance with these requirements.
- Extend these requirements and expectations to all their sub-tier suppliers.

OC also encourages suppliers to join or build partnerships with industry organizations implementing due diligence in the mineral supply chain.

## How to Report a Concern

Talk to a trusted resource or leader:

- Supervisor or another manager;
- Human Resources;
- Law Department; and/or
- Business Conduct Council Member.

OC's BCC Helpline Portal: <http://helpline.owenscorning.com> or (800)-461-9330.

## Glossary

Conflict-Affected and High-Risk Areas ("CAHRA"):

Aligned with the OECD definition, "Conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence, or other risks of harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterized by widespread human rights abuses and violations of national or international law."

Conflict Minerals:

As defined by the US legislation, currently include the metals tantalum, tin, tungsten, and gold, which are the extracts of the minerals cassiterite, columbite-tantalite and wolframite, respectively.

Downstream companies often refer to the extracts of these minerals as 3TG.

Due Diligence:

Due diligence is an on-going, proactive, and reactive process through which companies can ensure that they respect human rights and do not contribute to conflict. Due diligence can also help companies ensure they observe international law and comply with domestic laws, including those governing the illicit trade in minerals and United Nations sanctions. Risk-based due diligence refers to the steps companies should take to identify and address actual or potential risks to prevent or mitigate adverse impacts associated with their activities or sourcing decisions.

## Related Information

[OC Code of Conduct](#)

[OC Supplier Code of Conduct](#)

[OC Human Rights Policy](#)

[OC Sustainability](#)

OECD (2016), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition, OECD Publishing, Paris,

[OECD Due Diligence Guidance](#).

[SEC.gov | FACT SHEET](#), accessed 20 October 2024.

## Document History

Owens Corning is dedicated to the continuous improvement of this Policy. The Policy 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 October 2025