



Owens Corning Business Conduct Policy

Environmental, Health, Safety, & Product Stewardship

This policy is maintained by the Business Conduct Council, and was last updated January 2021.

Policy

ENVIRONMENTAL

Owens Corning is committed to the principles of Environmental Compliance, Environmental Sustainability, Product Compliance and Product Stewardship.

Environmental Compliance

Owens Corning is committed to ensuring that our operations are conducted in compliance with all applicable laws and regulations. Where appropriate to achieve internal goals and objectives, Owens Corning may develop standards, procedures, or guidelines that exceed the legal requirements. Because legal requirements can vary from jurisdiction to jurisdiction, whenever there is a difference between an Owens Corning internal requirement and a legal requirement, the more stringent requirement will be followed.

Environmental Sustainability

Owens Corning is committed to the principles of Environmental Sustainability. Beyond complying with applicable laws, regulations, and other EHS standards and guidelines, we seek to lead in responsible and sustainable behavior. We work hard to ensure that any negative effects our operations (our footprint) may have on the environment are minimized and that the positive impacts (our handprint) from the solutions we provide are maximized. We strive to create a culture that protects the environment and positively impacts the communities and world in which we operate.

Product Compliance & Product Stewardship

Owens Corning is committed to ensuring that our products are designed, manufactured and sold in compliance with all governmental laws and regulations. Further, we operate within the principles of Product Stewardship; that being, that our products perform as claimed and are safe and environmentally sound to make, use, and dispose of. We will provide useful information regarding the performance, regulatory requirements, and safe use of our products.

HEALTH & SAFETY

Owens Corning is committed to providing safe, secure working conditions and workplaces that promote health and well-being. Our commitment to safety is unconditional. We believe:

- All accidents are preventable
- Safety is everyone's responsibility
- Working safely is a condition of employment

Health & Safety Compliance

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MANDATORY PROCEDURES

ENVIRONMENTAL

Environmental Compliance

It is the responsibility of every Owens Corning employee to ensure that our operations are conducted in compliance with all applicable laws and regulations. The Regulatory Law Department (“Regulatory Law”) supports regulatory compliance for EHS and Product Stewardship through the development of OC Regulatory and Legal Interpretations. Regulatory Law must be consulted in the following situations:

- Government Body Inquiries
- Notice of Violation, Safety Citation or Equivalent Enforcement Action
- Fatality at OC owned or operated facility
- Development of an OC Regulatory or Legal Interpretation
- “Permitting Activities”

It is the responsibility of facility leadership to follow consultation and notification procedures as prescribed in the *Regulatory Law Standard – EHS Compliance* (EHS-001)¹. To ensure compliance and manage our environmental impacts, Owens Corning has implemented an Environmental Management System (EMS)². It is the responsibility of each facility to implement the EMS. It is the responsibility of each employee to follow all environmental rules and procedures that apply to our work. We must report any environmental incident, nonconformity, or noncompliance as described in the EMS.

Environmental Sustainability

Owens Corning’s reputation as a sustainable company depends on accurate and timely reporting of our progress toward Sustainability Goals and Targets. Each facility will report all required sustainability data completely and accurately as defined in the Sustainability Reporting Governance Documents. Owens Corning will never intentionally mislead stakeholders regarding our performance.

Product Compliance & Product Stewardship

Every Owens Corning product is made and placed into commerce in compliance with all laws pertaining to the chemical composition and use of our products. Compliance with these laws and regulations is a prerequisite to doing business. OC employees shall work with our Product and Chemical Regulatory Compliance team to ensure:

- Compliance with all chemical control laws and product hazard communication legal requirements;
- Availability of data and information needed to support compliance decisions; and
- Availability of accurate regulatory certifications and documentation for our customers and other stakeholders.

The Owens Corning Product Stewardship process protects the OC brand, minimizes product risks, and encourages sustainable product development. To assure implementation of our Product Stewardship principles, this Policy includes the following requirements:

- All new and substantially modified existing products must obtain a documented Product Stewardship Review prior to commercialization³, and
- All OC products will be designed and manufactured in accordance with OC’s Product Stewardship Guidelines and Standards⁴.

¹ See *Regulatory Law Standard – EHS Compliance* (EHS-001) for details on when and how to consult with and/or notify the Regulatory Law Department. This standard is located: <https://myoccentral.owenscorning.com/en-us/organization/EHSOpsSustainability/Standards/EHS%20Standard%20EHS-001%20-%20Regulatory%20Law%20Standard%20EHS.pdf>

² See the Environmental Management System website (<http://myoc.owenscorning.com/corp/qse/env/EMS/default.aspx>) for EMS requirements and guidance.

³ See *Product Stewardship Review Standard* and the *Product Stewardship Standard and Guideline (Managing Significant Changes)* for the definition of New and Significantly Modified Product and a detailed description of the Product Stewardship Review Process.

⁴ See the Product Stewardship home page (<https://myoccentral.owenscorning.com/en-us/sites/Product-Stewardship/>) for Product Stewardship guidelines and standards.



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Every employee is responsible for following all safety rules and procedures that apply to our work, and pay careful attention to our surroundings always⁵. We must report any work-related injury, first-aid, illness, near-miss, or unsafe condition, no matter how minor.

To achieve our commitment to safe and secure working conditions that promote health and well-being, Owens Corning put policies and practices in place, and provides the resources and training we need to be able to lead injury-free lives⁶ and to keep our facilities incident-free. All employees are required to model safe behavior and observe all safety policies, rules, and regulations. Failure to do so will result in corrective action as prescribed in the *Safety Violations Standard (CSS-010)*⁷. The *Safety Violations Standard* ensures that employees are aware of the levels of seriousness of safety requirements, and provides guidance on the types and levels of safety rules violations.

If you have a concern that you may have violated this policy, or you have a good faith suspicion that another OC employee is in violation of this policy, you should report this to your manager, leader, or another trusted manager, your Human Resources representative, a member of Legal Operations, or a member of the Business Conduct Council who shall refer the report for investigation and resolution.

If you do not feel comfortable reporting your concern to these individuals, you may call the Business Conduct Helpline in North America at 1-800-461-9330, (country-specific telephone numbers can be found in the Code of Conduct or the company intranet), or via the web at <http://helpline.owenscorning.com>.

NOTE: Any employee who fails to comply with this policy may be subject to discipline, up to and including termination.

⁵ See Leadership Safety Accountabilities (<https://myoccentral.owenscorning.com/en-us/safety/SafetyTopics/Documents/Leadership%20Safety%20Accountabilities-2015.ppt>) and Employee Safety Accountabilities (<https://myoccentral.owenscorning.com/en-us/safety/SafetyTopics/Documents/Employee%20Safety%20Responsibilities-2015.ppt>).

⁶ See Safety home page (<https://myoccentral.owenscorning.com/en-us/safety/>) for policies and resources.

⁷ See the *Safety Violations Standard (CSS-010)*, located: <https://myoccentral.owenscorning.com/en-us/safety/safetytopics/Pages/Safety-Violations-Standard.aspx>