



Safeguarding Human Rights at Owens Corning

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Purpose of this report

This supplement has been prepared to summarize Owens Corning's policies and procedures with respect to safeguarding human rights and decent working conditions and provides information on the implementation and results of Owens Corning's human rights due diligence.¹

About Owens Corning

Owens Corning is a global building and construction materials leader committed to building a sustainable future through material innovation. Our three integrated businesses – Composites, Insulation, and Roofing – provide durable, sustainable, energy-efficient solutions that leverage our unique material science, manufacturing, and market knowledge to help our customers win and grow. Our business is global in scope, with approximately one hundred operations spread across 31 countries, and human in scale, with approximately 19,000 employees and longstanding, local relationships with its customers². Founded in 1938 and based in Toledo, Ohio, Owens Corning recorded net sales in 2022 of \$9.8 billion. For more information see the [Owens Corning Website](#).

At Owens Corning, we define sustainability to include environmental, social and governance (ESG) concepts such as environmental compliance, product stewardship, personal safety, human rights, and the environmental and social impacts of our global operations and the products we make and sell.

Our Commitment to Human Rights

Owens Corning is committed to protecting the rights of people where we operate and to ensure they are treated with dignity and respect. Owens Corning is guided by the Ten Principles of the United Nations Global Compact, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Human Rights Governance

Policies and Governing Documents

The Owens Corning Human Rights Policy was implemented in 2015 and outlines specific commitments related to non-discrimination & equal opportunities, child labor, Indigenous People's traditional and land rights, forced labor, employment standards, compensation and working conditions, freedom of association and collective bargaining, workplace security, safety, health, environmental and product stewardship, non-harassment, and privacy for employees and stakeholders.

¹ This disclosure has been developed in accordance with the Norwegian Transparency Act section 5 requirements.

² Statistics as of end of 2022.

OWENS CORNING WORLD HEADQUARTERS

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Our Human Rights Policy applies to all Owens Corning employees (full time, part time, agency or contractors), 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. The policy includes standing policies, as noted, and addresses areas of human rights where no policy previously existed.

Human Rights elements are also addressed in the Owens Corning Code of Conduct. Owens Corning is committed to working with and encouraging our suppliers, customers, and other business relationships to uphold the principles of our Human Rights Policy and Code of Conduct and to adopt similar policies within their businesses.

The Owens Corning Supplier Code of Conduct applies to our suppliers and is aligned with the expectations and commitments in our overarching Human Rights Policy. The Supplier Code of Conduct also serves as a reference point in the sourcing selection processes and is central to our engagement with stakeholders.

Organizational Structure and Responsibilities

Owens Corning's Board of Directors (Board) consists of one executive director and nine independent non-executive directors and has the oversight responsibility of the management of the company. The Board oversees management's execution of Owens Corning's ESG strategy and performs an annual review of ESG matters. In addition, the Compensation, Finance, and Governance and Nominating Committees maintain oversight of management's responsibilities for particular aspects of ESG associated with their respective areas. The Board committees periodically provide reports concerning these ESG topics to the Board and the Board considers and discusses such reports.

The CEO holds the responsibility for managing sustainability risks, supported by the Executive Committee, which is accountable for ensuring risk management processes are in place and effectively managing mitigation efforts related to identified impacts. The CEO and Executive Committee report to the board on a quarterly basis.

Owens Corning's Senior Vice President and Chief Sustainability Officer (CSO) and Executive Vice President General Counsel are responsible for the detailed implementation processes related to human rights management including risk-assessments, audits, and training. Owens Corning created the CSO role in 2007 to underscore the essential role of sustainability in our overall operations. The CSO reports directly to the CEO and is responsible for our compliance with legal and company requirements related to environmental, safety, health, and sustainability.

Approach to Human Rights Due Diligence

Owens Corning undertakes ongoing due diligence in alignment with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises to identify, prevent, mitigate, and account for actual or potential adverse impacts on human rights and decent working conditions and provide for or co-operate in remediation where required.

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We are continually improving our internal management practices including our human rights due diligence process, and in 2022 we completed a risk-based approach to evaluate risks of adverse impacts on human rights based on the location and context of our sites, nature of business activities, number of people that could potentially be affected and severity and probability of impact. Based on the 2022 risk assessment, we focused our due diligence assessment on mining and sand suppliers located in high-risk jurisdictions to conduct additional site-level engagements and assessments this year. These focused activities will inform broader human rights due diligence work in 2023 and beyond.

Risk Assessment

Owens Corning utilizes several mechanisms to assess potential and actual impacts on the environment and society including audits, risk assessments, surveys, and impact assessments. Our revised environmental, health, and safety (EHS) audit process includes on the ground visual inspections of elements related to our human rights policy. These visual inspections covering forced labor, child labor, unsafe working conditions, and other human rights issues ensure that our workplaces reflect the highest human rights standards, as well as best practices for health and safety for employees, contractors, and visitors. In 2022, the internal audit team conducted 17 internal audits that included a review of human rights risk.

We also conduct annual human rights assessments via a survey for our key suppliers, which made up 75% of our sourcing managed spend in 2022. Over the past three years, 186 suppliers were assessed for their impacts on society and labor practices.

Our human rights policy is part of our overall due diligence process for potential acquisitions, which are a key element of our growth strategy. This process involves reviewing labor and human rights policies and practices and assessing risks, including evaluating any potential impacts on vulnerable groups.

Stakeholder Engagement

Owens Corning interacts with a wide range of stakeholders on a regular basis including investors, customers, suppliers, community members, trade associations, and NGOs, to name a few. Through these engagements, we seek to discuss our efforts accurately and transparently, understand concerns, and work together for solutions. To better understand our stakeholders' expectations and priorities, we actively engage and consult with individuals, groups, and organizations that are impacted by our business operations.

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 Business Conduct Council through a confidential helpline (1-800-461-9330) or web portal which are operated by a third-party service provider.

The collective stakeholder input is crucial to the board's fulfillment of its duties and responsibilities. It directly informs the board's identification and management of economic, environmental, and social matters and their impacts, risks, and opportunities. More information about our stakeholder engagement activities can be found in our [Sustainability Report](#).



Risk Analysis and Mitigation

Owens Corning plans to initiate a comprehensive human rights saliency assessment in 2023. Based on the results of this assessment, we will prioritize specific risks related to the geographies we operate in, products we produce and the goods and services we procure throughout our value chain.

Management of Impacts and Remediation Activities

During 2022, several situations were detected related to potential human rights impacts. Two equal opportunity concerns were reviewed by our Business Conduct Council and corrective actions and improvements were taken as applicable.

At one of our locations in Canada we identified a misapplication of our human rights policy which resulted in one individual under the age of 16 being employed part time for clerical work. After learning of the issue, corrective action was swiftly taken to remedy the impacts. This included education and training of our human resource employees, as well as implementing a systems solution that will provide even more stringent and proactive checks within our human resources systems going forward.

Finally, no cases of forced or compulsory labor were identified or reported in 2022 through our annual supplier survey. Given recent reports of concerns in the mining sector, Owens Corning enhanced its methodology to evaluate risk in this area. Through this process we are implementing a mechanism to categorize risk and implemented appropriate action plans across the different categories.

Focus in 2023 and beyond

To continually improve our due diligence systems and process, we will focus on initiating the following efforts related to human rights and decent working conditions in 2023 and beyond:

- Updating policies and procedures related to human rights management
- Strengthening governance of human rights
- Review of training programs related to human rights
- Initiating a human rights saliency assessment and identification of priority areas to complete a Human Rights Impact Assessment.
- Strengthening the supplier risk assessment processes related to human rights
- Conducting human rights risk assessment for high-risk suppliers and jurisdictions.

Contact us

If you have an inquiry related to our human rights performance, please use our Sustainability Inquiry email address (sustainability@owenscorning.com). Please include - "Human rights info request" in the subject line to ensure your question reaches the appropriate team.