



California Transparency in Supply Chains Act of 2010 Disclosure and U.K. Modern Slavery Act of 2015 Slavery and Human Trafficking Statement

The *California Transparency in Supply Chains Act of 2010* (SB 657) went into effect on January 1, 2012. This law requires manufacturers and retailers doing business in the State of California to disclose information regarding their efforts to eradicate slavery and human trafficking from their direct supply chains.

The *U.K. Modern Slavery Act of 2015* went into effect on October 15, 2015. This law requires companies doing business in the U.K with a financial turnover of £36 million annuals to disclose their business operations and supply chains are slavery free via a “slavery and human trafficking statement.”

Owens Corning is dedicated to conducting business in a lawful and ethical manner. As a signatory to the UN Global Compact, we are in the process of drafting and implementing a human rights policy that will join our other policies to ensure the safety and wellbeing of our employees and that we conduct ourselves in a manner consistent with our mission and values.¹

Furthermore, it is Owens Corning’s expectation that Owens Corning’s suppliers will conduct themselves in a lawful and ethical manner. Our 2014 Sustainability Report lists supply chain sustainability as one of our five 2020 goals: *An active supply chain sustainability program will be in place with communication, audits and engagement with all top-tier suppliers. The process will include:*

1. *Setting clear expectations for sustainability progress by our suppliers*
2. *Utilizing leading-edge sourcing practices*
3. *Measuring and disclosing supply chain performance*²

- **Verification of Supply Chain:** Owens Corning is committed to fair labor practices within our supply chain. Owens Corning does not currently audit product supply chains to evaluate and address risks of human trafficking and slavery. Owens Corning is in the process of evaluating its procedures in this area as our supply chain sustainability program evolves.
- **Supplier Certifications:** The **Owens Corning Supplier Code of Conduct** requires that Owens Corning suppliers not use child or forced labor when producing products, and comply with all applicable laws, rules and regulations in all locations where they conduct business. A segmented group of suppliers, identified by criticality to the company and risk in general is surveyed annually and adherence to this code of conduct is part of the assessment. If Suppliers choose not to certify to such conduct we follow up to understand reasons for declining certification.
- **Supplier Audits:** Under the Company’s supply contracts, Owens Corning has the right to audit all suppliers for compliance with the Owens Corning Supplier Code of Conduct. Owens Corning employees periodically inspect the facilities of its suppliers to ensure compliance with these standards. Facilities are generally selected for inspection where there has been identified quality or other issues. Suppliers are expected to keep accurate records to prove compliance with the Supplier Code of Conduct. Owens Corning does not employ independent third parties or conduct unannounced audits but is evaluating these options as our supply chain sustainability program evolves.

¹ These policies include our Company Code of Conduct, [Directors Code of Conduct](#), [Ethics Policy for Chief Executive and Senior Financial Officers](#), [Equal Opportunity Policy](#), Anti-Harassment Policy, Anti-Corruption Policy, and [Environmental, Health, Safety and Product Stewardship Policy](#) to ensure we act in accordance with Owens Corning standards as well as the principles of the UN Global Compact and the Universal Declaration of Human Rights.

² <http://sustainability.owenscorning.com/journey/2020-goals/>



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- **Internal Accountability Standards:** Owens Corning is a signatory to the UN Global Compact and has issued expectations in line with that defined in the [Owens Corning Supplier Code of Conduct](#), which requires suppliers to follow socially responsible business practices to ensure that products are produced under lawful, humane and ethical conditions. Among other things, our Supplier Code of Conduct requires that Owens Corning suppliers not use child or forced labor when producing products, and comply with all applicable laws, rules and regulations in all locations where they conduct business. The Supplier Code of Conduct is part of our purchasing agreements or purchase order terms. Owens Corning policy permits a range of measures up to and including termination of a supplier for violation of the Supplier Code of Conduct. This would include non-compliance with our company standards regarding slavery and trafficking. All of our employees are required to abide by our Company Code of Conduct to ensure that our business is always conducted in a legal and ethical manner. Currently, the Company Code of Conduct does not discuss internal procedures regarding forced labor and human trafficking. Owens Corning is evaluating its procedures in this area as part of the development of the Company's Human Rights Policy.
- **Employee Training:** Owens Corning conducts training on human trafficking for employees whose job functions include procurement. This training emphasizes the Company requirement that suppliers comply with the Supplier Code of Conduct. Owens Corning continues to update its policies and procedures to ensure safeguards against any mistreatment of persons involved in our supply chain and will continue to strengthen this training as the Company's Human Rights Policy is put in place.
- **Key Performance Indicators:** Owens Corning is in the process of evaluating potential key performance indicators that will assist in assessing the effectiveness of Owens Corning's anti-slavery activities.