



This is our **Communication on Progress** in implementing the principles of the **United Nations Global Compact** and supporting broader UN goals.

We welcome feedback on its contents.



## Introduction

Owens Corning is honored to be a member of the United Nations Global Compact since 2010. With its emphasis on sustainability and responsible business practices, the UN Global Compact is well-aligned with our company values. It also provides Owens Corning with a strong platform for embracing and enacting good corporate principles in the areas of human rights, labor, environment, and anticorruption.

The accompanying “Communication on Progress” document provides an overview of Owens Corning’s recent activities in support of Global Compact objectives.

### Statement of Continued Support

As the attached report illustrates, Owens Corning is committed – in both belief and action – to the 10 principles of the United Nations Global Compact. This commitment extends beyond making our products and operations more sustainable. It involves embracing the broader objectives of sustainability as we balance economic growth with social progress and environmental stewardship. In short, we believe that what is good for people and good for our planet is also good for Owens Corning.

Owens Corning continues to be recognized for its leadership in sustainability. In 2015, the company earned a place on the Dow Jones Sustainability World Index for the sixth year in a row, and for the third straight year was named Industry Leader for the DJSI World Building Products group. Owens Corning was also honored by being named to the Climate Disclosure Leadership Index (CDLI) by international environmental non-profit CDP.

Sustainability is also about responsible behavior and stewardship with regard to our employees and the communities in which they live and work. Owens Corning provides our people with clear guidance on how to conduct business ethically and comply with all laws through our Corporate Code of Business Conduct and Corporate Governance policies. These policies and standards of behavior reflect our values as a company and are incorporated into the way our employees work every day – with customers, colleagues, suppliers, and the broader public.

A key dimension of responsible behavior and stewardship relative to our employees is our continued quest for an injury-free workplace. In 2014, Owens Corning received the highest honor of the National Safety Council (NSC) – the Green Cross for Safety medal. NSC presents the award annually to an organization with outstanding safety performance and a commitment to improving the quality of life in the communities where its employees work and live. Reflecting our commitment to responsible business practices, over the past 13 years Owens Corning has eliminated nearly 95 percent of recordable injuries, as defined by the United States Occupational Safety & Health Administration.

Owens Corning strives for a workplace where all employees feel they can reach their true potential. In the 2016 results of the Human Rights Campaign Corporate Equality Index, Owens Corning earned a 100 percent score for the 12<sup>th</sup> year in a row. This means it is named a Best Place to Work for gay, lesbian, bisexual, and transgender equality.

Owens Corning made a strong commitment to our global communities by joining the United Nations Global Compact in 2010. Since then, we are proud of our continued progress in the sustainability arena and pleased to again renew our dedication to conducting business responsibly throughout the world.



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## Our 2015 Progress

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Click on each Principle to review Owens Corning's progress against each Principle.

Principles of the UN Global Compact	
<a href="#">Principle 1</a> : Businesses should support and respect the protection of internationally proclaimed human rights.	<a href="#">Principle 6</a> : Businesses should support the elimination of discrimination in respect of employment and occupation.
<a href="#">Principle 2</a> : Businesses should ensure that they are not complicit in human rights abuses.	<a href="#">Principle 7</a> : Businesses should support a precautionary approach to environmental challenges.
<a href="#">Principle 3</a> : Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	<a href="#">Principle 8</a> : Businesses should undertake initiatives to promote greater environmental responsibility.
<a href="#">Principle 4</a> : Businesses should support the elimination of all forms of forced and compulsory labour.	<a href="#">Principle 9</a> : Businesses should encourage the development and diffusion of environmentally friendly technologies.
<a href="#">Principle 5</a> : Businesses should support the effective abolition of child labour.	<a href="#">Principle 10</a> : Businesses should work against corruption in all its forms, including extortion and bribery.

Additional details can be found in the:

- [Owens Corning Human Rights Policy](#)
- [Owens Corning Code of Conduct](#)
- [Owens Corning Supplier Code of Conduct](#)



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**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights.

**Principle 2:** Businesses should ensure that they are not complicit in human rights abuses.

From the [Owens Corning 2015 Global Reporting Initiative Report](#) (p.7)  
[Safety, Health, Employee Engagement and Community Vitality](#)

- Reduced employee recordable incidents by 7 percent year-over-year and operate at a very high level of safety performance. We have fully integrated global wellness and sustainability into our safety and health strategies across the globe.
- Expanded our global efforts assisting families in need by providing clean drinking water systems in India and completing our first Habitat for Humanity builds in China.
- Provided substantial volunteers, products and financial support to assist more than 1,600 families obtains safe, affordable, energy-efficient housing to needy families through Habitat for Humanity and Make it Right organizations.
- Earned placement, for the sixth consecutive year, in the Dow Jones Sustainability World Index (DJSI World) in recognition of our sustainability initiatives, and for the third straight year, were named the Industry Leader for the DJSI World Building Products group.
- Aligned our Human Rights Policy with our commitment to the United Nations Global Compact. Our policy meets the requirements of both the California Transparency in Supply Chain Act of 2010 and the U.K. Modern Slavery Act of 2015. It is informed by the Universal Declaration of Human Rights, the United Nations Ten Guiding Principles and the recently released Sustainable Development Goals.

From the [Owens Corning 2015 Global Reporting Initiative Report](#) (p.10-11)  
[Our Precautionary Approach](#) (G4-14, 15)

Owens Corning has been a signatory to the United Nations Global Compact since 2010. The UN Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with 10 universally accepted principles in the areas of human rights, labor, environment, and anti-corruption. By doing so, business, as a primary driver of globalization, can help ensure that markets, commerce, technology, and finance advance in ways that benefit economies and societies everywhere. Principle 7 of the Global Compact states “Businesses should support a precautionary approach to environmental challenges.”

With respect to the precautionary approach, Owens Corning ensures that our products and technology comply with or exceed all applicable laws, regulations, and approval standards to protect the environment and human life and health. Our product stewardship programs are designed to ensure integrity of our products and the processes used to develop, produce, and manage them. Owens Corning is confident that these efforts are consistent with and meet the



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expectation of the precautionary approach. Our product stewardship policy can be viewed on the Owens Corning Sustainability website.

In addition, Owens Corning publically states our support for the UN Universal Declaration of Human Rights. The creation of the 30 articles in 1948 which make up the Universal Declaration was a watershed moment in the history of international human rights. As one of the primary driving forces behind the UN Global Compact, the Universal Declaration of Human Rights is as relevant and impactful as ever. Owens Corning is committed – in both belief and action – to the 10 principles of the Global Compact and the 30 articles of the Universal Declaration of Human Rights. This commitment extends beyond making our products and operations more sustainable. It involves embracing the broader objectives of sustainability as we balance economic growth with social progress and environmental stewardship. In short, we believe that what is good for people and good for our planet is also good for Owens Corning. Our Human Rights Policy, Supplier Code of Conduct, Company Code of Conduct, Anti-Corruption Policy, and Environmental, Health, Safety and Product Stewardship Policy all ensure we act in accordance with the principles of the UN Global Compact and the Universal Declaration of Human Rights.

From the [Owens Corning 2015 Global Reporting Initiative Report \(p.62\)](#)  
[Freedom of Association and Collective Bargaining Risks \(G4-HR4\)](#)

An independent trade union represents 65% of our employees who are also covered by collective bargaining agreements. To support employee rights to exercise freedom of association and collective bargaining, we have enabled ten consultations/negotiations with trade unions over organizational changes, including restructuring and outsourcing.

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### **Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

From the [Owens Corning 2015 Global Reporting Initiative Report](#) (p.62)  
Freedom of Association and Collective Bargaining Risks (G4-HR4)

An independent trade union represents 65% of our employees who are also covered by collective bargaining agreements. To support employee rights to exercise freedom of association and collective bargaining, we have enabled ten consultations/negotiations with trade unions over organizational changes, including restructuring and outsourcing.

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## **Principle 4:** Businesses should support the elimination of all forms of forced and compulsory labour.

From the [Owens Corning 2015 Global Reporting Initiative Report](#) (p.62)  
Child Labor and Forced Labor Related Risks (G4-HR5, HR6)

Our equal opportunity policy has appropriate clauses and checks to prevent child labor or forced labor. Owens Corning defines child labor as work or service extracted from anyone under the age of sixteen, and defines forced labor as any work or service not voluntarily performed and extracted from an individual under threat of force.

Through a strong governance process, we ensure that we do not engage with a supplier or distributor or enter into a joint venture with an organization that employs or subcontracts child labor or forced labor. We are a signatory to the United Nations Global Compact (since 2010) which 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. By aligning with UN Global Compact we ensure that advancements in markets, commerce, technology, and finance can benefit economies and societies across geographies.

Principle 5 of the UN Global Compact is concerned with the effective abolition of child labor. It is our highest priority to ensure that none of our operations are identified as a significant risk for child labor practices. Given our stringent focus on preventing child labor, no case of child labor has been reported in 2015. Principle 4 of the UN Global Compact is concerned with the elimination of all forms of forced and compulsory labor. We do not have any operations at risk with respect to forced or compulsory labor practices. No cases of forced or compulsory labor were reported in 2015.

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## Principle 5: Businesses should support the effective abolition of child labour.

From the [Owens Corning 2015 Global Reporting Initiative Report](#) (p.62)  
Child Labor and Forced Labor Related Risks (G4-HR5, HR6)

Our equal opportunity policy has appropriate clauses and checks to prevent child labor or forced labor. Owens Corning defines child labor as work or service extracted from anyone under the age of sixteen, and defines forced labor as any work or service not voluntarily performed and extracted from an individual under threat of force.

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## Principle 6: Businesses should support the elimination of discrimination in respect of employment and occupation.

From the [Owens Corning 2015 Global Reporting Initiative Report](#) (p.62)  
Freedom of Association and Collective Bargaining Risks (G4-HR4)

An independent trade union represents 65% of our employees who are also covered by collective bargaining agreements. To support employee rights to exercise freedom of association and collective bargaining, we have enabled ten consultations/negotiations with trade unions over organizational changes, including restructuring and outsourcing.

From the [Owens Corning 2015 Global Reporting Initiative Report](#) (p.26)  
Core Values and Code of Conduct (G4-56)

Compliance at Owens Corning means that we all follow our Ten Guiding Principles all of the time, with no exceptions. Our Guiding Principles are designed to ensure that employees act with integrity and in an ethical manner, avoiding even the appearance of impropriety. Each guiding principle is supported by one or more Business Conduct Policies detailing compliance expectations. Owens Corning's Code of Conduct and Ten Guiding Principles are inspired by and aligned to the UN Global Compact, the Universal Declaration of Human Rights, the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and the OECD Convention on Combating Bribery.

This Code of Business Conduct applies to Owens Corning, all of its controlled domestic and foreign subsidiaries, and all other legal entities in which Owens Corning has the controlling interest (more than 50% ownership). These policies are made available to employees via the myOC home page in nine languages (Company Policies > Business Conduct Website). The Business Conduct Council, with two company executives as members, has oversight responsibility for worldwide compliance with these policies.

Our Code of Business Conduct is an extension of our corporate values, and 100% compliance is an expectation of employment at Owens Corning.

The Code of Conduct covers the following subject matters at group level:

- Corruption and bribery
- Discrimination
- Confidentiality of information
- Antitrust/anticompetitive practices
- Money-laundering and/or insider trading/dealing
- Environment, health and safety
- Whistleblowing





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From the [Owens Corning 2015 Global Reporting Initiative Report \(p.28\)](#)  
[Equal Opportunity](#)

It is the policy of Owens Corning to provide employment opportunities without regard to race, color, religion, national origin, age, disability, veteran or military status, pregnancy status, gender, gender identity, sexual orientation, or genetic information.

The Company seeks to maintain a highly productive organization of men and women who represent differences in viewpoints, cultures, races and gender, and embraces good ideas produced by that diversity. This will be accomplished through selection and training of qualified people and will provide them with compensation, benefits, and opportunities for advancement without discrimination. This policy is subject to the requirements of local laws and regulations.

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at Owens Corning will be based on merit, qualifications, and abilities. Owens Corning does not discriminate in employment opportunities or practices on the basis of race, color, religion, gender, gender identity, sexual orientation, national origin, age, veteran or military status, pregnancy status, disability, genetic information, or any other characteristic protected by applicable law. Owens Corning will not tolerate acts of discrimination (which includes harassment).

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 as set forth below.

Owens Corning does not and will not employ child labor or forced labor. In addition, Owens Corning will not knowingly engage a supplier or distributor, or enter into a joint venture with an organization, that employs or subcontracts child labor or forced labor. Owens Corning defines "child labor" as work or service extracted from anyone under the age of sixteen, and defines "forced labor" as any work or service not voluntarily performed and extracted from an individual under threat of force.

For more information, please see the [Equal Opportunity Policy](#) on Owens Corning's website.

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## Principle 7: Businesses should support a precautionary approach to environmental challenges.

From the [Owens Corning 2015 Global Reporting Initiative Report \(p.10-11\)](#)  
[Our Precautionary Approach \(G4-14, 15\)](#)

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## Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility.

From the [Owens Corning 2015 Global Reporting Initiative Report \(p.145-147\)](#)  
Recycled Material

Owens Corning is one of the largest users of recycled glass in the world, using over 1 billion pounds annually of curbside consumer containers and pre-consumer recycled glass. When it comes to using recycled glass content in our insulation, we use as much as we can get. Through the years, we have increased our use of recycled glass, working in collaboration with municipalities and partners throughout the supply chain to increase recycled glass collection and processing but recycling of glass is at risk.

### Introduction

Recycled materials are a raw material for Owens Corning. Within our business units we work to maximize the amount of recycled materials to reduce our footprint. We utilize recycled content in most of our building products including fiberglass, extruded polystyrene (XPS) foam, and mineral wool insulation and source packaging materials with recycled content.

#### Glass Recycling

Owens Corning is one of the largest users of recycled glass in the world, using over 1 billion pounds annually of curbside consumer containers and pre-consumer recycled glass. Using recycled glass not only decreases community landfill waste, but it also lowers our energy use when manufacturing insulation, since starting with raw materials such as sand requires more energy.

Although we strive for higher glass recycled content we realize recycling of glass is at risk. While glass bottles and jars can be endlessly recycled and produced into fiberglass insulation as well as other uses, according to the United States Environmental Protection Agency and reported by GPI.org, only 34% of all glass containers were recycled in 2013. Glass recycling is currently under immense pressure and numerous municipalities across the U.S. have made the decision to remove glass from their curbside recycling programs, further threatening future cullet supply.

To counteract these trends, Owens Corning is actively involved with a number of organizations aimed to make glass recycling a successful industry, such as the newly formed Glass Recycling Coalition (GRC). The GRC is a partnership of organizations throughout the entire glass recycling supply chain working to develop strategies to assist municipalities with glass recycling decisions and establish a network of glass recycling resources and champions. Owens Corning has also been involved in glass recycling workshops aimed at creating an open dialogue of stakeholders from the recycled glass supply chain

In addition to our engagement with the GRC, we also work with the North American Insulation Manufacturers Association (NAIMA) and involved in several educational and informational workshops including those by the Closed Loop Fund and the Georgia Glass Recycling Workshop coordinated by SMI.



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## Enhancing Input Recycled Content (G4-EN1, EN2)

We have a multi-pronged approach towards enhancing the recycled content, which includes:

- Seeking to include or increase the content of recycled materials in our products, and packaging either in initial design or continuous improvement;
- Validating recycled content through third party verification bodies -- Scientific Certification Systems -- and offer documentation for use in green building programs, such as LEED;
- Promoting the attribute of recycled content and educate customers and consumers on the value this brings to reducing landfill waste and saving resources and energy. We promote this through advertising, trade shows, external speaking engagements, product literature and training, and information on our website. Our specifications provided for architects and specifiers also feature the element of recycled content for example our Division 7 E-Book;
- Promoting greener product/greener operations in industry presentations, case studies and forums including the benefit of recycle content and reducing impact in the life cycle analysis of the product for all the industries we serve; and
- Being members of organizations that promote recycled content in products, including the USGBC and their LEED program. Owens Corning employs third party certifiers such as Scientific Certification Systems and UL Environment.

Following are the details of our recycled input materials:

<b>Total weight of materials used</b>	6,105,752 metric tons
<b>Total volume of recycled raw materials</b>	695,678 metric tons
<b>Percent of recycled content</b>	11%

## Recycled Content in Primary Product and Services

Below we have provided a further explanation on recycled content in different products and services across the organization.

### Insulation products

Owens Corning is a leader in recycled content for fiberglass insulation, having a minimum of 53% recycled content and going as high as 73% for Canadian-made products, while continuing to provide the same energy-saving performance our customers expect.

We also have a highly certified post-consumer amount for our light density building insulation at a minimum 37% for North America. We also have 20% certified pre-consumer content in our XPS foam insulation in North America, using waste from various foam manufacturing operations. Both product lines are certified by Scientific Certification Systems for recycled content, providing building professionals documentation that these products can contribute to meeting green building guidelines, such as LEED certification.

Thermafiber® mineral wool insulation has a minimum 70% recycled content and is validated by ICC Evaluation Services.

### Roofing products

Other Owens Corning products, including Roofing products, have recycled content dependent on where they are produced.



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## Recycling End of Life Building Materials

### **Shingle recycling**

Owens Corning Roofing and Asphalt, LLC, is the first roofing manufacturer to establish a program for recycling shingles. Recycling torn-off shingles helps the environment in two ways: (1) old shingles don't end up in a landfill, and (2) they get repurposed as pavement. Each year in the U.S., approximately 10 million tons of recyclable shingles are removed from the roofs of homes and buildings.

We connect contractors with convenient recycling facilities through a national strategic alliance with Earth911.com and Heritage Environmental Services. As part of this program, contractors take the Preferred Contractor Shingle Recycling Pledge, committing to recycle their shingle tear-offs. Currently, there are 109 major cities with recycling locations. Sixty five percent of the U.S. population is covered by these locations allowing us to add the label "Shingles are Recyclable." Homeowners can also commit to recycling by taking their version of the Shingle Recycling Pledge and selecting a contractor who recycles shingles from Owens Corning's contractor locator page. In 2015, we recycled an estimated 1.3 million tons of shingles through our recycling network, or the equivalent of 371,000 roofs saved from the landfill, of which the primary repurpose is asphalt pavement. Additionally, 31 new contractors in our contractor network pledged to recycle.

## Process Waste Recycling

Recycling initiatives have further reduced waste to landfill within our operations. Our 2020 goal is 70% waste reduction, with an aspiration to achieve zero waste to landfill at all our facilities.

***Further details on process waste recycling can be reviewed in the Waste Management section of the report***

## From the [Owens Corning 2015 Global Reporting Initiative Report \(p.72\)](#) Energy Intensity Reduction (EN5)

We continue to expand efforts to reduce our energy intensity across our operations. In 2015, our weighted average energy intensity was 2.92 MWH, a reduction of over 5% from 2014. We have actively taken conservation measures to significantly reduce energy consumption and improve plant efficiency as represented in our energy efficiency programs.





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Normalized Consumed Energy Usage 2010-2015	2010	2011	2012	2013	2014	2015
Weighted Intensity Percentage	100	101	95	91	87	83
Weighted Intensity (MWH/MT of product produced)	3.54	3.57	3.35	3.22	3.09	2.92
Intensity is normalized based on MT of product produced						

Table 3: Energy intensity between 2010 and 2015\*

\*Calculated using all forms of energy consumed internally by Owens Corning for its operations. Types of energy include fossil fuels (diesel, natural gas, propane, and others) as well as electricity.

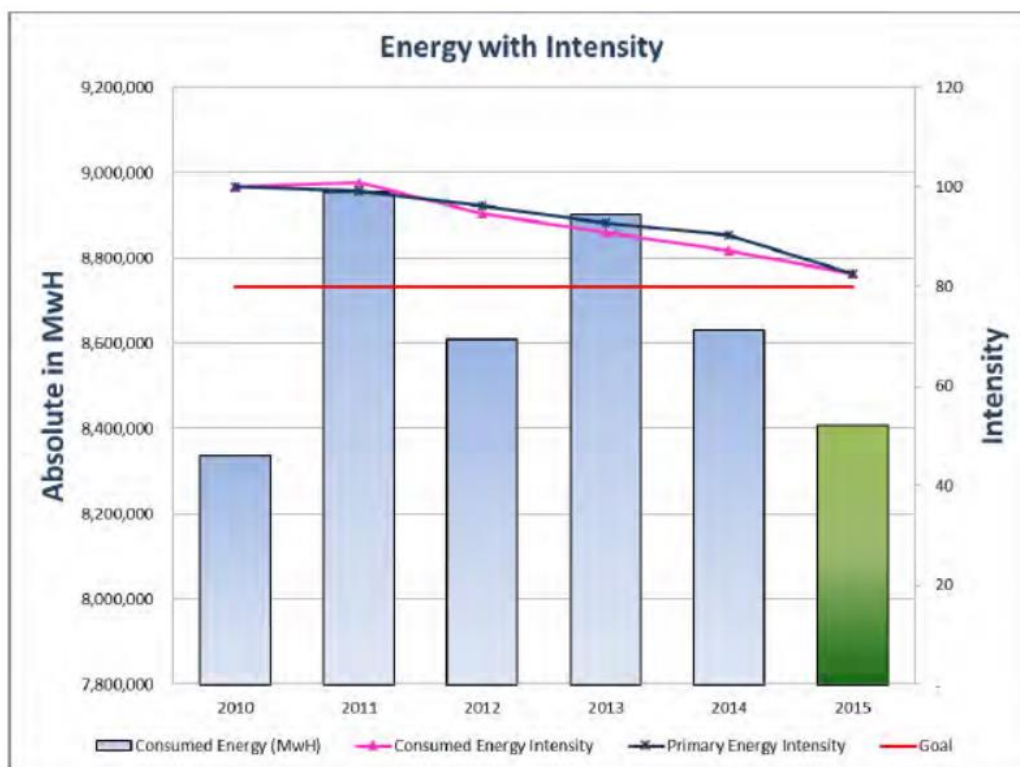


Figure 5: Results for our Energy intensity between 2010 and 2015 against our 20% Intensity Goal by 2020

From the [Owens Corning 2015 Global Reporting Initiative Report](#) (p.73)  
Energy Conservation: Projects and Initiatives Undertaken (EN6, EN7)

At Owens Corning, we make energy conservation an integral part of our operations by deploying energy saving programs across our enterprise (see Figure 6) including low cost/no cost projects, capital projects, renewable energy, new technologies and innovation, asset optimization, and infrastructure improvements. According to the eGRID and IPCC factors used to calculate





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greenhouse gas (GHG) emissions, we have been able to achieve energy savings of over 34,500 MT of GHG emissions as a result of implementing energy efficiency programs in 2015.

As part of our energy savings efforts, we continue to evaluate the possibility of expanding the projects across our facilities globally. With a robust pipeline of current and future projects focused on energy conservation, we plan to create a continuous improvement cycle for superior energy conservation.

Some of the key energy efficiency projects implemented across our units in 2015 include:

- **Indoor and Outdoor Energy Efficient Lighting Upgrades:** Implemented 12 lighting upgrade projects across the organization including warehouses and production areas.
- **Flexible Frequency Drives for Process Fans and Pumps:** Deployed 11 variable frequency drive projects on fans, pumps, and other motors across our three businesses.
- **Meters and Leak Detection Equipment:** Implemented two projects, one for metering and one for leak detection, to identify leaks as well as improve monitoring and system efficiency.
- **V-Notched Belt Conversion on Motors:** Implemented two belt projects on various motors.
- **Men's locker room hot water energy upgrade:** Implemented a hot water energy upgrade at an Insulation location.
- **Tank Insulation:** Enabled asphalt tank insulation.
- **HVAC System Upgrades and Replacement:** Employed two HVAC projects in different businesses.
- **Compressed Air Compressor Replacement/Upgrade:** Replaced a compressor at an Insulation plant.
- **Air Compressors with New Controls:** Upgraded compressed air compressors with new controls.
- **Chiller Replacement and High Efficiency Motors:** Replaced chiller and deployed high efficiency motor at a Composites plant.
- **Furnace with Sidewall Insulation:** Implemented a natural gas and electric savings furnace at a Composites plant.

## Energy Saving Products

Our commitment to sustainability starts with our passion for developing energy saving products such as insulation and durable products that significantly reduce energy and associated emissions. Our wide ranging energy saving products include:

- **Fiberglass Insulation:** Fiberglass insulation, first commercialized by Owens Corning in the 1930s, is the most widely used type of insulation in the United States, Canada and Mexico today. A typical pound of insulation saves 12 times as much energy in its first year in place as the energy used to produce it. That means the energy consumed during manufacturing is saved during the first 4-5 weeks of product use. The insulation continues to save that amount of energy every month throughout the life of the home or building in which it is installed.

Other fiberglass insulation products provide energy-saving thermal protection for HVAC, mechanical and commercial applications.

- **Extruded Polystyrene (XPS) Insulation:** Our FOAMULAR® extruded polystyrene (XPS) insulation, a rigid board, is used on exterior and interior walls, foundations, roofs and infrastructure for thermal insulation even in wet conditions. It is reusable, with a proven history of removal, salvage, and reuse.



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- **Mineral Wool Insulation:** Thermafiber® insulation was acquired by Owens Corning in 2013 to complement our portfolio of energy-saving products. Thermafiber® is used in commercial and residential buildings and can also deliver fire containment with its high temperature durability.
- **Cool Roof Shingles:** 'Our wide color range of "cool roof" shingles use a highly reflective granule technology that bounces back the sun's rays, helping keep roofs cooler and reduce air conditioning energy levels. They meet EPA ENERGY STAR® requirements for solar reflectance of .25, the fraction of solar energy reflected by the roof.
- **Composites:** Fiberglass-reinforced composites can be light, insulating and corrosion-, impact-, and heat-resistant, and are used to replace steel, aluminum, wood, and other materials. Fiberglass as a reinforcement provides for lighter weight while delivering comparable or better strength than other materials such as steel. Lighter weight means more fuel efficiency in all forms of transportation. With increasingly higher strength technology, composites have also provided more efficiency and greater economy for wind energy turbines using longer, lighter, and more productive blades at lower wind speeds.

For some applications glass fiber composites also have been shown to have less impact on the environment through comparison of the life cycle assessment of specific parts made from steel and aluminum. Life cycle assessment takes into consideration the raw materials extraction, manufacturing, installation, maintenance, and end of life of composite parts vs. other materials.

## Water Recycling and Reuse (G4-EN10)

We have taken several steps to enhance recycling and reuse of water at our plants. Since 2010, we have considerably increased our water recirculation and recycled water percentages as production processes at our Insulation facilities support water recirculation. As a result we have seen a significant decrease in water withdrawal, despite increasing production in our most water-intensive business.

As a company we consider recirculated water as water that is used in the production of prime product and is (a) used in a recirculating (closed-loop) system; and (b) exits the recirculating system when it evaporates or the recirculating system is flushed or cleaned. We define recycled water as water that is used in the production of prime product and is then (a) pulled out of a specific production process area, mechanically and/or chemically treated, then returned to the same process; or (b) pulled out of a specific production process area and used in a different area (either production-related or nonproduction-related).

In several facilities that manufacture our composites products, process water is recycled and utilized for cooling towers and landscaping purposes.

In 2015, Owens Corning had a total water withdrawal of 9,764,192 cubic meters, of which 5%, or 476,026 cubic meters was recycled. We recirculated 183,854,399 cubic meters of water, which constitutes 1883% of total water use.



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## From the [Owens Corning 2015 Global Reporting Initiative Report](#) (p.101) Water Discharge (G4-EN22)

We track and report discharge (see Figure 4) quantities across all facilities by measuring and monitoring water discharge through meter readings. In places where meter readings are unavailable, the calculation is based on estimates of water withdrawn, consumed, and evaporated through our production processes.

Compared to 2014, we have reduced overall water discharge by more than 225,000 cubic meters. Additionally, many of our facilities have achieved zero discharge – excluding water discharged for irrigation.

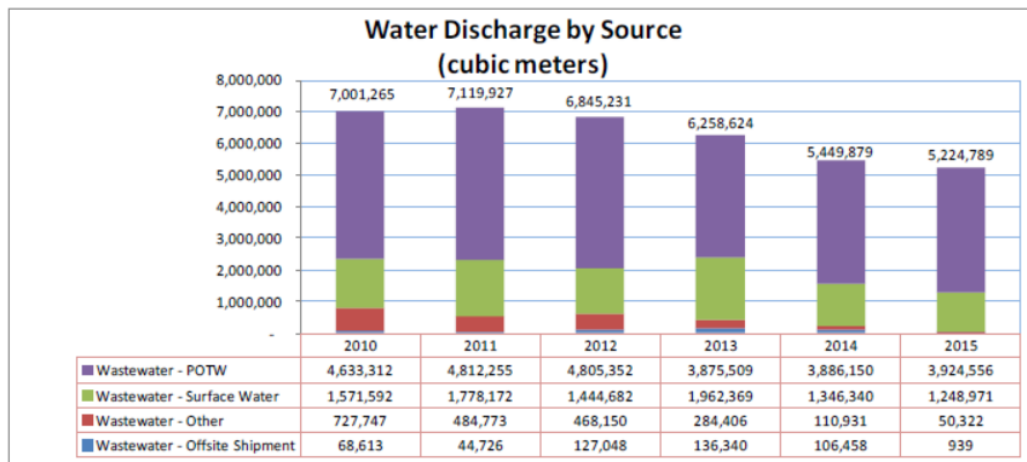


Figure 4: Owens Corning water discharge

We monitor water discharge intensity and have achieved 6% reduction in 2015 as compared to 2014 (see Table 1).

Wastewater Intensity					
2010	2011	2012	2013	2014	2015
1.12	1.04	1.05	0.96	0.94	0.89

**Cubic Meters of Wastewater Discharged per Metric Ton of Product Produced**

Table1: Owens Corning waste water discharge intensity

We ensure that the discharged water quality meets the prescribed limit and the standards our facilities have implemented treatment techniques to treat water discharge. The table below shows our water quality measurements.



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### **Key Plants for Monitoring Water Quality**

Our different processes sometimes require specific monitoring and treatment processes to ensure we are meeting or exceeding all regulatory requirements. At facilities where Owens Corning has determined water intake and discharge treatment to be critical we implement additional monitoring and treatment processes best suited for the specific needs of that site. A site in the southern region of the United States uses reverse osmosis to minimize total dissolved solids in incoming water, whereas another facility in the same region has a large filtration treatment system to control discharge.

From the [Owens Corning 2015 Global Reporting Initiative Report \(p.103\)](#)  
[Impact of Discharge Water \(G4-EN26\)](#)

Owens Corning is not impacting any special protected water bodies and related habitats anywhere as defined at the country level by the UN World Heritage Sites, UN Biosphere Sites, Alliance for Zero Extinction (AZE) sites, Ramsar Wetlands, or Natura 2000 (European Sites). This determination is based on an evaluation conducted annually by Owens Corning which continues to show lack of proximity of Company manufacturing site locations to the special sites or species. Regarding environments that are around our facilities, discharges are controlled through permits and required monitoring. Unauthorized discharges and runoff must also be reported to the environmental and legal departments of the corporation and corrective action must be taken if occurring. Employees are subject to disciplinary action for knowing failure to comply with company environmental reporting requirements.

## **Monitoring Mechanism**

We periodically review our performance, goals, and targets based on our management system and existing practices. The review ensures that all necessary systems are in place for tracking and monitoring performance. Based on the results, we continually redefine the goals and targets. We also disclose our environmental performance on our sustainability website, GRI, and our CDP Water Response, as well as assess our position compared to other companies. This enables all stakeholders to provide feedback, which, in turn, is reviewed for necessary action and response.

At Owens Corning, a water sustainability team meets with business unit representatives and our manufacturing strategic controls team. The team evaluates data, conducts water surveys and discusses projects and water initiatives at the facility level. The team also tracks locally implemented initiatives at the plant level, records best practices, circulates the information internally, and reports on the progress to our Chief Sustainability Officer (CSO).

Our sustainability organization is headed by a CSO, who is also accountable for the Company's compliance with environmental, safety, health, and sustainability matters. As sustainability is one of Owens Corning's four operational stands, our employees are accountable for looking for ways to reduce our environmental footprint, taking action to reduce water usage, and sharing ideas on how to achieve our sustainability goals.



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From the [Owens Corning 2015 Global Reporting Initiative Report](#) (p.90)  
Greenhouse Gas Intensity (G4-EN18)

Owens Corning uses a weight average intensity calculation to track progress against our 2020 environmental sustainability goals. The goals encompass Scopes 1, 2, and 3 business travel. Our weighted average intensity improved 12% from 2014 and has improved by 41% compared to our 2010 baseline. Our total GHG Intensity in 2015 for all Scopes 1, 2, and 3 was 1.78 MT CO<sub>2</sub>e per MT of product produced.

Normalized GHG Emissions 2010-2015	2010	2011	2012	2013	2014	2015
Weighted Intensity Percentage	100	85	77	68	67	59
Weighted Intensity (MT/MT of product produced)	2.63	2.25	2.03	1.79	1.77	1.55
Intensity is normalized based on MT of product produced						

Table 3: Normalized GHG Emissions 2010-2015

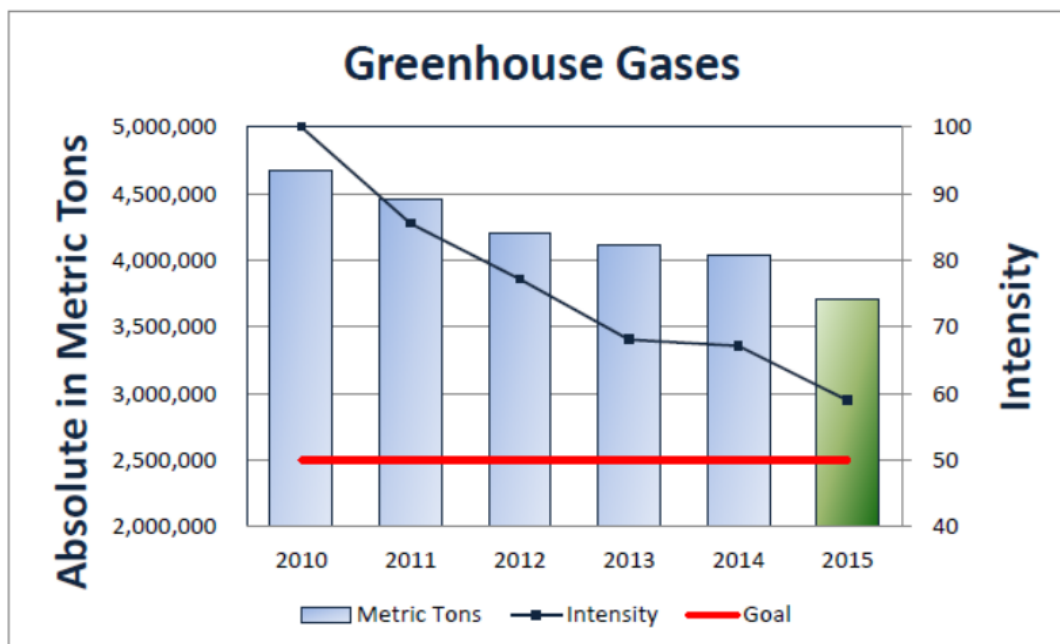


Figure 6: GHG 2010-2015



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From the [Owens Corning 2015 Global Reporting Initiative Report \(p.92-95\)](#)  
Air Emissions (G4-EN21)

Given our significant progress on air emissions, in 2015 we announced a new toxic air emissions (TAE) goal, a 75% reduction in TAE intensity by 2020 from the 2010 baseline. In the current reporting cycle we achieved 55% absolute reduction in TAE and a 66% reduction in Toxic Air Intensity.

### NOx and SOx Emissions

As a part of its broader sustainability framework, we manage, track, and report against NOx and SOx air emissions. In 2015 we saw a 37% absolute reduction in NOx and 22% absolute reduction in SOx from our base year 2010.

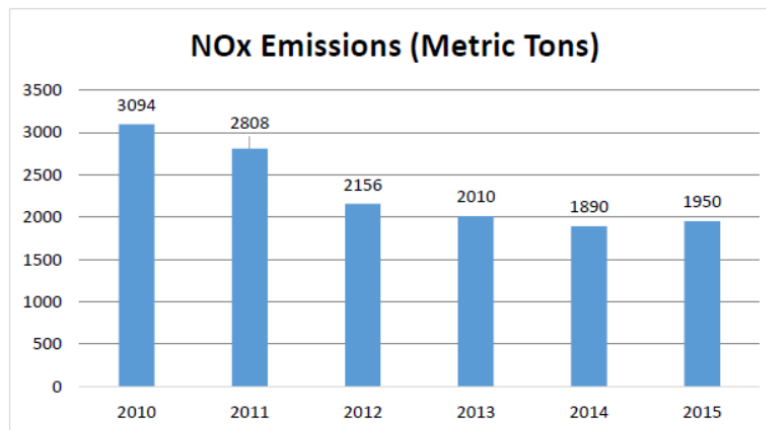


Figure 8: NOx Emissions 2010-2015

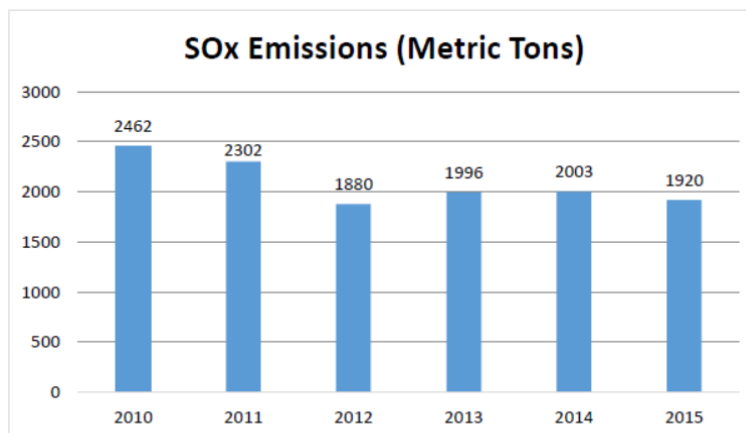


Figure 9: SOx Emissions 2010-2015





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From an intensity standpoint, we achieved a 52% reduction in NOx emission intensity and a 44% reduction in SOx emissions intensity from the 2010 base year.

### Dust Emissions (PM2.5)

In 2010, we committed to a 15% reduction goal for PM2.5 by 2020. In 2015 we achieved 17% reduction in PM2.5 emission intensity from our 2010 baseline year, surpassing our 2020 goal.

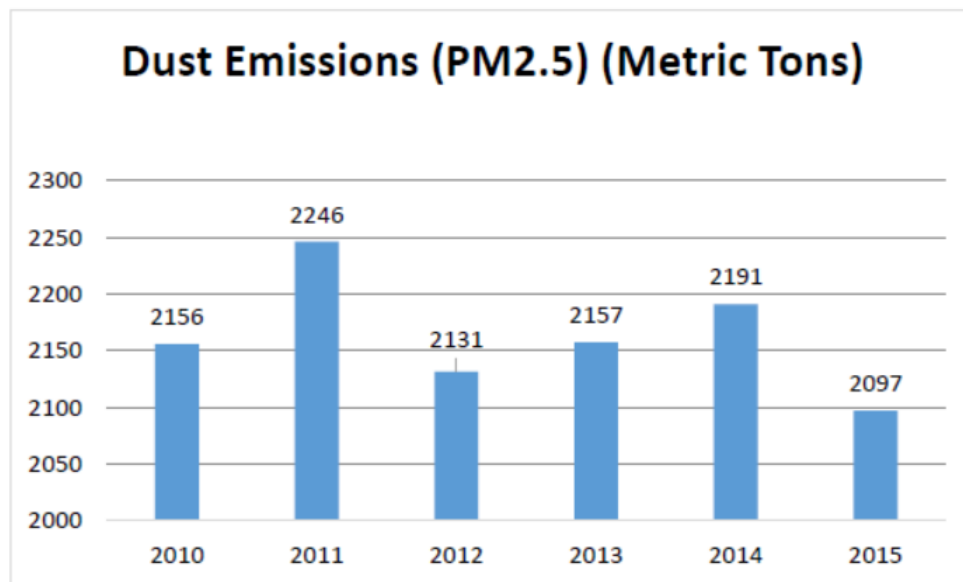


Figure 10: Dust Emissions (PM2.5) 2010-2015

Normalized PM2.5 Emissions 2010-2015	2010	2011	2012	2013	2014	2015
Weighted Intensity Percentage	100	97	93	88	90	83
Weighted Intensity (MT/MT of product produced)	.0016	.0016	.0015	.0014	.0015	.0014
Intensity is normalized based on MT of product produced						

Table 4: Normalized PM2.5 Emissions 2010-2015

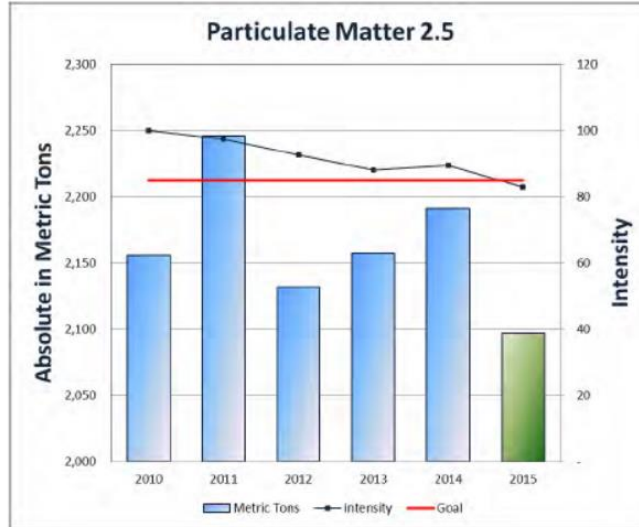


Figure 11: Particulate Matter 2.5 2010-2015

The residential EcoTouch® insulation conversion has driven much of the improvement seen to date. As evidenced with the conversion, the key to achieving further gains will be capturing more synergies between greening our products and greening our operations.

To ensure consistency of testing for air and dust emissions, we have subject matter experts who oversee testing at our facilities to ensure that results gathered are consistent and verifiable. These individuals travel on-site for the testing events and review the lab results and findings. Additionally, they partner with the business units and plants to ensure that we understand the impact of potential changes to our processes and plan accordingly for future events.

### Toxic Air Emissions (TAE)

We are committed to a 75% reduction goal for TAE by 2020. In 2015 we achieved 66% reduction in TAE intensity from our 2010 baseline year.





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Owens Corning defines TAEs to include hexavalent chromium, formaldehyde, manganese, polycyclic aromatic compounds, and ammonia. This shift in focus for air emissions acknowledges our past successes and our concern for pollutants that carry greater air quality concerns.

From the [Owens Corning 2015 Global Reporting Initiative Report](#) (p.135-136)  
Environmental Impacts - Products and Services (G4-EN27)

Product and service information is required by the organization's procedures for product and service information and labeling.		
	Yes	No
Content, particularly with regard to substances that might produce an environment or social impact		x
Safe use of the product or service	x	x
Disposal of the product and environmental/social impacts		x

Table1: Products and Services information

At Owens Corning we calculate the environmental footprint of our products by conducting the LCA. Full cradle-to-grave assessments examine all stages of a product's life, starting with the extraction of raw material inputs, continuing through processing, manufacturing and product use, and ending with disposal or recycling.

During product stewardship reviews, compliance with the plant and location's environmental laws and requirements are reviewed. All new and significantly modified existing products sold by Owens Corning undergo a comprehensive product stewardship review to ensure that they perform as claimed and are both safe and environmentally sound to make, use, and dispose of. Additionally, we are committed to evaluating each of these products for their net sustainability gains or losses compared to existing products.

We have a documented guideline regarding materials of concern to Owens Corning. The purpose is to provide guidelines on banned and restricted substances. The guidelines apply to all Owens Corning-controlled domestic and foreign subsidiaries, and all other legal entities in which Owens Corning has control. Our guideline applies to the use of raw materials and other substances in all business activities used to produce products, including research and development, manufacturing, tolling operations, and distribution. This scope includes materials used to maintain the site facility and equipment. The list is reviewed at every product stewardship review.

#### Initiatives Undertaken to Mitigate Environmental Impact

- An example of designing a product with a positive overall impact is Owens Corning's EcoTouch® PINK® FIBERGLAS® Insulation. It delivers customers comfort by helping homes stay cooler in the summer and warmer in the winter, while helping reduce monthly heating and cooling costs (saving energy) for the life of the home. Designed with the environment in mind, EcoTouch® PINK® FIBERGLAS® Insulation includes a minimum of 50% total recycled



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content, is GREENGUARD Gold Certified, and is verified to be formaldehyde free. The use of renewable components like a bio-based binder, a high recycled glass content, the use of non-formaldehyde added materials during its production, and lowering volatile organic compounds (VOC) and particulate emissions at our manufacturing facilities were all part of the design criteria for EcoTouch® PINK® FIBERGLAS® Insulation.

- Owens Corning is also engaged in many efforts aimed at mitigating the amount of waste generated from our manufacturing processes in addition to reducing the amount sent to landfill through waste diversion programs.
- In our Insulation business, the amount of virgin raw material is reduced by purchasing pre- and post-consumer recycled glass cullet.
- Innovative manufacturing process technologies aimed at recycling off-spec product have been employed throughout our Insulation manufacturing facilities.
- When internal recycling practices have been exhausted, Owens Corning furthers our efforts to divert waste-to-landfill. With Hose2Habitat, we look at all of our waste streams out of our manufacturing plants and assess materials, that after reaching the end of their service life have the potential to enrich the habitat for animals. Materials and items for this program cardboard cores; conveyor belts; batch transfer buckets; sweeper brushes; brooms; grating; guarding equipment; empty spools; light- and heavy-duty hose; rope; lanyards; equipment strapping; super-sacks used for packaging; PVC pipe; conduit; plastic duct; 5-gallon buckets; 55-gallon poly drums; shipping crates; plastic pallets; and rubber tires. For more details on our Hose2Habitat program, please see the included presentation. In addition to Hose2Habitat, we donate off-spec, damaged, or prime product to organizations such as Habitat for Humanity, Good 360, and World Vision.
- We sell various levels or grades of our product, whether it's damaged, off-spec or slow moving and obsolete inventory (SMOI) in the form of B-grade, C-grade, salvage and scrap.
- As a global organization operating in many different countries and regions, some of our plants have developed outlets that have the ability to incinerate waste to generate electricity or other forms of energy. Owens Corning is committed to reducing waste generated at any point throughout the life cycle of the products we manufacture, including from the value chains of which we are part.

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## Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.

From the [Owens Corning 2015 Global Reporting Initiative Report \(p.73\)](#)  
Energy Conservation: Projects and Initiatives Undertaken (EN6, EN7)

At Owens Corning, we make energy conservation an integral part of our operations by deploying energy saving programs across our enterprise (see Figure 6) including low cost/no cost projects, capital projects, renewable energy, new technologies and innovation, asset optimization, and infrastructure improvements. According to the eGRID and IPCC factors used to calculate greenhouse gas (GHG) emissions, we have been able to achieve energy savings of over 34,500 MT of GHG emissions as a result of implementing energy efficiency programs in 2015.

As part of our energy savings efforts, we continue to evaluate the possibility of expanding the projects across our facilities globally. With a robust pipeline of current and future projects focused on energy conservation, we plan to create a continuous improvement cycle for superior energy conservation.

Some of the key energy efficiency projects implemented across our units in 2015 include:

- **Indoor and Outdoor Energy Efficient Lighting Upgrades:** Implemented 12 lighting upgrade projects across the organization including warehouses and production areas.
- **Flexible Frequency Drives for Process Fans and Pumps:** Deployed 11 variable frequency drive projects on fans, pumps, and other motors across our three businesses.
- **Meters and Leak Detection Equipment:** Implemented two projects, one for metering and one for leak detection, to identify leaks as well as improve monitoring and system efficiency.
- **V-Notched Belt Conversion on Motors:** Implemented two belt projects on various motors.
- **Men's locker room hot water energy upgrade:** Implemented a hot water energy upgrade at an Insulation location.
- **Tank Insulation:** Enabled asphalt tank insulation.
- **HVAC System Upgrades and Replacement:** Employed two HVAC projects in different businesses.
- **Compressed Air Compressor Replacement/Upgrade:** Replaced a compressor at an Insulation plant.
- **Air Compressors with New Controls:** Upgraded compressed air compressors with new controls.
- **Chiller Replacement and High Efficiency Motors:** Replaced chiller and deployed high efficiency motor at a Composites plant.
- **Furnace with Sidewall Insulation:** Implemented a natural gas and electric savings furnace at a Composites plant.

### Energy Saving Products

Our commitment to sustainability starts with our passion for developing energy saving products such as insulation and durable products that significantly reduce energy and associated emissions.

Our wide ranging energy saving products include:





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- **Fiberglass Insulation:** Fiberglass insulation, first commercialized by Owens Corning in the 1930s, is the most widely used type of insulation in the United States, Canada and Mexico today. A typical pound of insulation saves 12 times as much energy in its first year in place as the energy used to produce it. That means the energy consumed during manufacturing is saved during the first 4-5 weeks of product use. The insulation continues to save that amount of energy every month throughout the life of the home or building in which it is installed.

Other fiberglass insulation products provide energy-saving thermal protection for HVAC, mechanical and commercial applications.

- **Extruded Polystyrene (XPS) Insulation:** Our FOAMULAR® extruded polystyrene (XPS) insulation, a rigid board, is used on exterior and interior walls, foundations, roofs and infrastructure for thermal insulation even in wet conditions. It is reusable, with a proven history of removal, salvage, and reuse.
- **Mineral Wool Insulation:** Thermafiber® insulation was acquired by Owens Corning in 2013 to complement our portfolio of energy-saving products. Thermafiber® is used in commercial and residential buildings and can also deliver fire containment with its high temperature durability.
- **Cool Roof Shingles:** 'Our wide color range of "cool roof" shingles use a highly reflective granule technology that bounces back the sun's rays, helping keep roofs cooler and reduce air conditioning energy levels. They meet EPA ENERGY STAR® requirements for solar reflectance of .25, the fraction of solar energy reflected by the roof.
- **Composites:** Fiberglass-reinforced composites can be light, insulating and corrosion-, impact-, and heat-resistant, and are used to replace steel, aluminum, wood, and other materials. Fiberglass as a reinforcement provides for lighter weight while delivering comparable or better strength than other materials such as steel. Lighter weight means more fuel efficiency in all forms of transportation. With increasingly higher strength technology, composites have also provided more efficiency and greater economy for wind energy turbines using longer, lighter, and more productive blades at lower wind speeds.

For some applications glass fiber composites also have been shown to have less impact on the environment through comparison of the life cycle assessment of specific parts made from steel and aluminum. Life cycle assessment takes into consideration the raw materials extraction, manufacturing, installation, maintenance, and end of life of composite parts vs. other materials.

## From 2015 Owens Corning Global Reporting Initiative Report (p.154-156) Product Innovation

At Owens Corning we are committed to innovation and value creation on behalf of our customers. Our vision to become a global company where market-leading businesses are built is spearheading our path toward new innovation. Fostering an innovative spirit will continue to be a cornerstone of our industry leadership to meet the ongoing challenges we face as a global community and enable continued growth into even more demanding, innovative applications and technologies.

Over the years, we have shifted from our approach of innovating technologies and then finding customers to innovations for meeting market need. We produce innovative products that improve quality of life and energy efficiencies; helping us support our commitment to environmental stewardship and social progress. Owens Corning has launched significant game-changing innovations in each of our businesses, allowing us to secure our market share in key segments. We've launched new products in the alternative-energy, transportation and communications





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markets and made significant enhancements to our Roofing and Insulation products. By leveraging our glass fiber technology, we position ourselves to develop specialty non-wovens that are flexible and strong enough to withstand tensile and flexural requirements in today's complex Composite-based products.

We find new ways to deliver innovative product and service solutions that meet customer needs. We listen to our customers and strive to deliver strong product performance with the introduction of best-in-class products and solutions supported by world-class technical expertise. With eight worldwide research and development centers located in key markets, we invest [offer: make investments] to ensure we deliver products and solutions focused on optimizing the role of our products in our customer's value chain. Through this focus, we work with our customers to deliver increased competitiveness through product redesign or productivity improvements. We offer one of the strongest technical teams in the industry to develop new products, solutions, and applications. We are an organization that responds quickly to changes in the market and our customers' businesses, providing relevant product, and solutions.

Owens Corning is committed to growing our employees and our talent mindset. Merging our employees' ideas with customers' feedback drives the innovation process. Owens Corning realizes employees are our biggest asset. We focus on skill development programs for our leaders with topics ranging from market segmentation, to identifying and articulating customer value proposition, to mapping out the value chain within industry and determining strategic control points. We are also investing in developing the change management capability of our leaders by teaching them key methodologies, skills, considerations, and approaches to initiating and sustaining change in their businesses as well as with external stakeholders. At Owens Corning, having unique relationship networks encourages people to connect together and fosters innovation. We have partnered with the world's foremost leaders in binder and coating technology, which enables us to develop solution-based products to meet customer needs.

As part of our innovation process, we have a structured product stewardship process where all new and significantly modified existing products sold by Owens Corning undergo a comprehensive review. This ensures our products perform as claimed and are both safe and environmentally sound to make, use, and dispose. We have conducted more than 1,119 reviews since 1997 and more than 822 since 2006 when the product stewardship program was made a mandatory element of our Business Code of Conduct Policy. Product reviews address all elements of Owens Corning's Environmental, Health, Safety and Product Stewardship Policy, and are carried out by highly qualified Product Stewardship Review Board members. Reviews are conducted at various stages, including the design, development, and test market, manufacture, pre-launch, and distribution phases.

The product stewardship process is also utilized to evaluate and approve opportunities for recycling of materials, which includes products manufactured and/or sold by Owens Corning and the waste material generated from the manufacturing of Owens Corning products that are reused (recycled) for purposes other than their intended use. Although a significant number of both internal and external recycling/repurposing opportunities were at various stages in the pipeline last year, six met the criteria for Product Stewardship Review in 2015 and 43 have been evaluated since 2006.

We also leverage a process we call Customer Discovery with select customers to have a more personal, candid conversation about where we are currently creating value and to identify what we can do to create additional value. This data is analyzed on a quarterly basis and factors into our



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strategic planning process, new product innovation, and functional area improvements and feeds business cases for investment.

#### **Commitments and Goals:**

We are committed to evaluate 100% of our new and significantly modified products through our stringent product stewardship process. Additionally, we are committed to evaluating each of these programs for their net sustainability gains or losses compared to existing products.

We have a 2020 goal to create the pipeline and increase the value through sustainability in the innovation process.

### **Sustainability-driven Innovations**

Owens Corning's commitment to sustainability starts with innovation and collaboration to deliver energy efficiency and durable material solutions at scale.

#### **Insulation:**

Fiberglass insulation, first commercialized by Owens Corning in the 1930s, is the most widely used type of insulation in the United States, Canada, and Mexico today.

A typical pound of insulation saves 12 times as much energy in its first year in place as the energy used to produce it. That means the energy consumed during manufacturing is saved during the first four to five weeks of product use. The insulation continues to save that amount of energy every month throughout the life of the home or building in which it is installed.

EcoTouch® PINK® FIBERGLAS™ Insulation includes a minimum of 50% total recycled content, is GREENGUARD Gold Certified and is verified to be formaldehyde free. The use of renewable components, like a bio-based binder, a high recycled glass content, the use of non-formaldehyde added materials during its production, and lowering volatile organic compounds (VOC) and particulate emissions at our manufacturing facilities were all part of the design criteria for EcoTouch® PINK® FIBERGLAS™ Insulation.

Other insulation products provide energy-saving thermal protection for HVAC, mechanical, and commercial applications including extruded polystyrene (XPS) and mineral wool Insulation.

#### **Roofing:**

Our wide color range of "cool roof" shingles use a highly reflective granule technology that bounces back the sun's rays, helping keep roofs cooler and reduce air conditioning energy levels. They meet ENERGY STAR® requirements for solar reflectance of .25, the fraction of solar energy reflected by the roof.

#### **Composites:**

In several applications, glass fiberglass-reinforced composites can be light, insulating, and corrosion-, impact-, and heat-resistant, and are used to replace steel, aluminum, wood, and other materials. Fiberglass as a reinforcement provides for lighter weight while delivering comparable or better strength than other materials such as steel. Lighter weight means more fuel efficiency in all forms of transportation. With increasingly higher strength technology, composites have also provided more efficiency and greater economy for wind energy turbines using longer, lighter, and more productive blades at lower wind speeds.



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Glass fiber composites also have been shown to have less impact on the environment through comparison of the life cycle assessment of specific parts made from steel and aluminum. Life cycle assessment takes into consideration the raw materials extraction, manufacturing, installation, maintenance, and end of life of composite parts vs. other materials.

## Direct/Indirect Economic Impact of Product Innovations

A risk we see related to our business and our industry is the significant competition we face in the markets we serve and we may not be able to compete successfully. All of the markets we serve are highly competitive. We compete with manufacturers and distributors, both within and outside the U.S., in the sale of building products and composite products. Some of our competitors may have superior financial, technical, marketing, and other resources than we do. In some cases, we face competition from manufacturers in countries able to produce similar products at lower costs. We also face competition from the introduction of new products or technologies that may address our customers' needs in a better manner, whether based on considerations of pricing, usability, effectiveness, sustainability, quality, or other features or benefits. If we are not able to successfully commercialize our innovation efforts, we may lose market share. Price competition or overcapacity may limit our ability to raise prices for our products when necessary, may force us to reduce prices, and may also result in reduced levels of demand for our products and cause us to lose market share. In addition, in order to effectively compete, we must continue to develop new products that meet changing consumer preferences and successfully develop, manufacture and market these new products. Our inability to effectively compete could result in the loss of customers and reduce the sales of our products, which could have a materially adverse impact on our business, financial condition, and results of operations.

## Recognition Received

**JEC Americas 2014 Innovation Award – Wind Energy Category Winner:** The JEC Group, the world's largest organization dedicated exclusively to the composites industry, awarded Owens Corning with the 2014 Innovation Award for Innovative Wind Turbine Blades Manufactured with Glass Fabrics. The award is intended to highlight the most pivotal advances in composites design, manufacturing, and application.

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**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

From the [Owens Corning 2015 Global Reporting Initiative Report \(p.62\)](#)  
Anti-corruption (G4-SO3)

At Owens Corning, we ensure compliance with anti-corruption laws and maintain an anti-corruption compliance program to prevent violations by any of our employees or agents. All of our business units have been analyzed comprehensively for risks related to corruption.

From the [Owens Corning Code of Conduct \(p.9\)](#)

## ANTI-CORRUPTION

Around the world, we are committed to acting with integrity. We believe in the merits of our products and principles, and let those drive our business success. Our commitment to integrity means we abide by all of the anti-corruption laws that apply to us in our various locations, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and the OECD Convention on Combating Bribery.

These laws make it illegal to make or offer improper payments to public officials—which include employees of government-owned enterprises, candidates for political office, and staff at all levels of government. We never make corrupt payments as a means to further our business goals.

## BRIBERY, KICKBACKS, AND IMPROPER PAYMENTS

Bribery is the giving of something of value—including charitable donations, cash, travel expenses, gifts, offers of entertainment, or any other thing of value to the recipient—in order to obtain (or retain) business or some other improper advantage. It is a form of corruption, and therefore not an act in which we take part.

Similarly, we do not accept kickbacks. Kickbacks are the return of a sum received (or due to be received) as part of an agreement to foster or arrange business. These and other improper payments go against our values, and are against the law. We pride ourselves on always conducting our business lawfully and with integrity.

## FACILITATING PAYMENTS

Facilitating (or facilitation) payments are small payments, usually made in cash, used to expedite routine government actions, such as processing a visa. Although these payments are allowed in some countries, because of the risk for corruption, we do not allow facilitating payments at Owens Corning. If someone requests such a payment from you—or any other improper payment—report the incident and seek guidance from a member of the Legal Department.

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# Human Rights

## Policy

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Owens Corning is committed – in both belief and action – to the Ten Principles of the United Nations Global Compact and the 30 articles of the Universal Declaration of Human Rights. This commitment extends beyond making our products and operations more sustainable. It involves embracing the broader objectives of sustainability as we balance economic growth with social progress and environmental stewardship. In short, we believe that what is good for people and good for our planet is also good for Owens Corning.

Owens Corning has been a signatory to the UN Global Compact since 2010. The UN Global Compact is a strategic, voluntary, policy initiative for businesses that are committed to aligning their operations and strategies with 10 universally accepted principles in the areas of human rights, labor, environment and anti-corruption. By doing so, business, as a primary driver of globalization, can help ensure that markets, commerce, technology and finance advance in ways that benefit economies and societies everywhere.

In addition, Owens Corning publically states our support for the Universal Declaration of Human Rights. The creation of the 30 articles in 1948 which make up the Declaration was a watershed moment in the history of international human rights and one of the primary driving forces behind the UN Global Compact. We are dedicated to being a solid, corporate citizen around the world, and to conduct ourselves and transact our day-to-day business in alignment with the Declaration. We know that maintaining a strong and positive reputation as a global company is premised on earning it each and every day. We earn this reputation through caring for our relationships with employees, suppliers, and our stakeholders and communities.

## Disclosures

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We created the [Owens Corning Supplier Code of Conduct](#) to ensure each of our suppliers meet our standards. Consistent with our Company Code of Conduct and our UN Global Compact commitments, it outlines the various sets of expectations we have of our suppliers, sets forth key principles we expect our suppliers to embrace, and acts as a reference for us in our sourcing selection processes. Alignment with our Supplier Code of Conduct is a prerequisite to being a supplier of Owens Corning.

Our [California Transparency in Supply Chain Act of 2010 Statement](#) and Slavery and Human Trafficking Statement in compliance with the U.K. Modern Slavery Act of 2015 articulates our continued practice to disclose information regarding efforts to eradicate slavery and human trafficking from our direct supply chain and internal operations.

We follow Securities and Exchange Commission guidelines in [disclosing any use of Conflict Minerals](#) and in conducting reasonable country of origin inquiries for any Conflict Minerals. We work with our suppliers to ensure compliance with the guidelines.

Any relevant human rights information not specifically addressed in the above disclosures is publically reported in our annual sustainability report.



# Human Rights

## Communities

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Owens Corning is committed to being proactive in the communities in which we live and work. We do this through involvement with community organizations and foundations as well as creating opportunities to engage in meaningful dialogue with local stakeholders. We are dedicated to being responsible and active members of our global communities. We encourage employees to participate in company-sponsored volunteer events and to use the Owens Corning Foundation's Enhancing Lives Grant program to provide funding to local charities. In our most economically and socially challenged locations, we partner with expert non-governmental organizations to complete community assessments which are then used to engage the community in the most beneficial manner possible.





## OWENS CORNING CODE OF CONDUCT



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# LETTER FROM OUR CEO

TO ALL OWENS CORNING EMPLOYEES,



At Owens Corning, we aspire to build market-leading businesses; global in scope, human in scale. To achieve this aspiration, every one of us must live our company values and follow our Code of Conduct and its 10 Guiding Principles. Conducting business ethically is both an opportunity and a responsibility of every employee.

Owens Corning has a reputation for doing the right thing both in the products we make and in how we interact with others. We preserve and enhance this reputation by acting with integrity and making ethical decisions. Through our actions, we earn the trust of our suppliers, our customers, our co-workers, and our investors.

We share a responsibility to act when any one of us recognizes that our Code or policies are not being upheld. Most questions about proper conduct can be addressed by our Human Resources representatives, Legal Department, or any leader. All reports are taken seriously and appropriately investigated.

The Code of Conduct is a powerful mechanism for assuring a sustainable, respected company. I thank you for taking our Code as seriously as I do and I appreciate your full attention to understanding and operating in full compliance with its principles.

A handwritten signature in black ink that reads "Michael H. Thaman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mike Thaman

Chairman of the Board and Chief Executive Officer



# 10 GUIDING PRINCIPLES TO ETHICAL BUSINESS CONDUCT

## 1. VALUE HUMAN HEALTH AND OUR ENVIRONMENT

Owens Corning is committed to environmental compliance and the principles of sustainability, product stewardship, and personal safety.

## 2. ACT WITH INTEGRITY

All employees will conduct business with integrity, without corruption or bribery and will spend Owens Corning money in compliance with Gifts, Entertainment and Travel, and Political Contributions Guidelines.

## 3. TREAT OTHERS RESPECTFULLY

Owens Corning provides safe, fair, and respectful working conditions and is free of unlawful discrimination or harassment.

## 4. COMPETE VIGOROUSLY BUT LAWFULLY

It is the responsibility of each employee to ensure that our efforts in the marketplace are conducted in accordance with the letter and spirit of applicable antitrust and competition laws.

## 5. HONOR TRADE RESTRICTIONS

Employees shall comply fully with all applicable laws and regulations in the countries where we do business, including U.S. embargoes, sanctions, export controls, and restrictions on doing business with “denied parties.”

## 6. CREATE A NO CONFLICTS CULTURE

All employees must avoid any activity that creates or appears to create a conflict between his or her interest and the interest of Owens Corning.

## 7. KEEP ACCURATE RECORDS

Making false or misleading entries or records is strictly prohibited. Making sure that Company records are maintained and managed according to policy and reflect the transactions of its business in an accurate, truthful, and timely manner is imperative.

## 8. RESPECT AND PRESERVE CONFIDENTIAL INFORMATION

Employees must safeguard and protect Company proprietary information, assets, and resources. Avoid unauthorized disclosure of nonpublic information acquired in the workplace and the misuse of material nonpublic information in securities trading.

## 9. ENSURE THAT COMMITMENTS ARE PROPERLY MADE

Contracts must be approved or executed in compliance with the Levels of Authority Policy.

## 10. PROPERLY USE COMPANY ELECTRONIC SYSTEMS

Employees must strictly adhere to the Use of Electronic Systems Policy and understand and follow the Acceptable Use Guidelines when using any Company electronic system.

# INTRODUCTION



## PROMOTING ETHICAL CONDUCT

At Owens Corning, we take pride in doing business with integrity. Our ethical business conduct has helped to secure a good reputation with our Company's stakeholders. Their trust in us, and the efficiency we gain from doing things right the first time, will help Owens Corning continue to grow and thrive as we move forward.

Our Code of Conduct ("Code") remind us of the most important concerns for doing business ethically, and this code of conduct shows us how to put them into action. This Code is designed to aid us in making tough decisions. If you find that you need more detailed information than you find here, this Code can point you toward the people and policies that can give you more information and advice.

## OUR CODE APPLIES TO EVERYONE

Our Code applies to every single person at Owens Corning, regardless of position or seniority. By living up to these expectations, we show our stakeholders that we respect them, we respect Owens Corning, and we respect the value of ethical business conduct.

We also expect that our business partners will follow similar principles. We always prefer to work with people and organizations that share our high regard for ethics and integrity.

In addition to our Code and the Company policies that support it, we're also responsible for knowing and following the laws and regulations that apply to our work. If there is ever a conflict between local law and our Company policies or this Code, seek guidance from the Legal Department.



# ASK QUESTIONS AND RAISE CONCERNS

## MAKING PRINCIPLED DECISIONS

Our Company relies on each of us to take personal responsibility for our work and conduct, especially when we have questions or concerns about ethical behavior. If you're not sure what to do, consult resources such as this Code and our policies.

In complex situations, take the time to consider your options carefully. How do our 10 Guiding Principles apply to your situation—and furthermore:

- Is this the right thing to do?
- Am I acting truthfully and with the right intentions?
- Would I be proud to tell my family about this decision?
- How would I feel if this decision were reported in the news?

If you are still unsure what course of action to take, don't hesitate to ask. We are a team, and there are many resources available to help answer questions and discuss any concerns.

## REPORTING, INVESTIGATIONS, AND CORRECTIVE ACTION

There are a number of resources we can turn to any time we are unsure about the right course of action. By reporting our concerns as soon as they arise and seeking guidance before we act, we are helping Owens Corning improve processes and solve problems quickly.

Reports may be submitted by:

- Talking to your manager, leader, or another manager you trust
- Talking to your Human Resources representative or any Human Resources director
- Talking to any member of the Business Conduct Council or member of the Legal Department
- Writing a letter to:

OC Ethical Business Complaints  
Office of the General Counsel 2-29  
One Owens Corning Parkway  
Toledo, OH 43659

- Writing an email to:  
[ethical.business.complaints@owenscorning.com](mailto:ethical.business.complaints@owenscorning.com)

- Calling the confidential Business Conduct Helpline

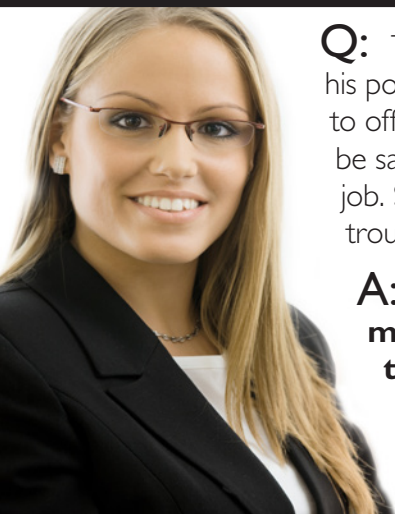
o US: 1-800-241-5689

o International: dial your country access code, then the telephone number listed below

COUNTRY	ACCESS CODE	COUNTRY	ACCESS CODE
Belgium	0-800-100-10	Korea	00-729-11
Brazil	0-800-888-8288	Mexico	01-800 288-2872
China	10-811	Netherlands	0800-022-9111
France	0-800-99-0011	Russia	8^495-363-2400
India	000-117	Singapore	800-011-1111
Italy	800-172-444	Spain	900-99-0011
Japan	0034-811-001	UK	0-800-89-0011

Dial access code above, then enter 866-620-9420

For additional access codes, please visit <http://www.att.com/esupport/travelerjsp>



**Q:** Teresa sees one of her coworkers, Jon, saving files to a USB drive, which he then puts in his pocket. She knows that Jon has gotten a couple of calls recently from recruiters who want to offer him positions with some of our competitors. Teresa suddenly wonders if he could be saving confidential Company information onto the USB drive to take with him to a new job. Should Teresa say anything? She and Jon are friends and she doesn't want to get him in trouble if she's mistaken.

**A:** Teresa should let her manager know about what she's seen. If there is misconduct going on, it is always better if our Company is able to put an end to it early on, before the problem becomes larger or hurts more people. If Jon's actions are innocent, then Teresa's concerns can easily be put to rest. Teresa should also keep in mind that Owens Corning is committed to protecting us from any negative consequences of reporting misconduct.



Due to data protection laws, employees who reside in European Union countries may report anonymously only for matters involving finance, auditing, accounting, banking, anti-competition and bribery. All other potential violations of this code or company policies should be reported directly to a manager or leader, a Human Resources representative, any Human Resources director, a member of the Business Conduct Council or a member of the Legal Department .

In most cases, managers and Human Resources Leaders are expected to use sound discretion and good business judgment in deciding whether a potential Code violation should be escalated to the BCC. However, managers and Human Resources Leaders must report potential accounting fraud, bribery, or price-fixing violations to the BCC Chairman.

## WHAT HAPPENS AFTER YOU MAKE A REPORT

Owens Corning takes all reports of misconduct seriously. If our Company learns of wrongdoing, it will act swiftly to correct the problem and prevent future occurrences. Owens Corning makes every effort to ensure that investigations are consistent, comprehensive, confidential to the extent possible, and follow applicable laws. If requested, you are expected to cooperate in any investigation of possible wrongdoing. By providing as much information and detail as possible when we report, we can help our Company to solve the issues we raise.

If the investigation reveals that misconduct has occurred, our Company may respond as it deems appropriate or necessary, consistent with the law. Depending on the circumstances, this may include training and/or disciplinary action, including termination. Individuals may also be subject to civil or criminal prosecution for violating the law.

## OUR COMMITMENT TO NON-RETALIATION

We believe that reports, investigations, and constructive criticism play an important role in making our Company a great place to work. Because Owens Corning values this feedback, our Company is committed to protecting everyone who makes a report or participates in an investigation in good faith. Retaliation, harassment, and reprisals of any kind are not tolerated at Owens Corning.

**“Good faith” means that when we make a report or participate in an investigation, we honestly provide all the information we have. It doesn’t matter if it later turns out that we were mistaken, or if Owens Corning decides that the incident we reported is not a violation of law, policy, or this Code.**

## FURTHER EXPECTATIONS FOR MANAGERS

Holding a management position at Owens Corning means accepting an additional set of responsibilities. We expect our managers to demonstrate a strong commitment to leadership and teamwork. If you are a manager, you should:

- Lead by example to make sure all employees know and understand this Code, other Company policies, and applicable laws
- Create an open door-type environment so that other employees feel comfortable asking questions and making reports
- Promptly escalate reports from employees to the appropriate resources
- Promote training and career development for your direct reports



# I. WE VALUE HUMAN HEALTH AND OUR ENVIRONMENT

## WORKPLACE SAFETY

Our Company is committed to providing safe, secure working conditions and workplaces that promote health and well-being. Owens Corning has put policies and practices in place to support these goals, and provides the resources and training we need to be able to lead injury-free lives. Our commitment to safety is unconditional. We believe:

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

In turn, we are each responsible for following all safety rules and procedures that apply to our work. In order to prevent accidents, we pay careful attention to our surroundings at all times. We report any work-related injury, illness, near-miss, or unsafe condition, no matter how minor. We strive to keep our facilities incident-free.

For more information, ask your manager or refer to the *Safety Company Standards*.



**Q:** Rose gets too close to a piece of equipment that she thought was turned all the way off and nearly gets hurt. She pulls her hands away quickly and turns the machine off properly before she notices that she does have a cut on the side of one hand. The cut isn't deep, so she doesn't think she needs to mention it to anyone. Is she right?

**A:** No, Rose should let her manager know about the incident. Even though she wasn't badly hurt, this is a good opportunity for Rose's manager to remind the whole team about what our safety procedures are and how important it is that we follow them. Reporting all incidents is one important way we can assure that hazards are exposed and eliminated.

## VIOLENCE

Violence in the workplace is unacceptable at Owens Corning. Because we value each other's well-being, we always work out our disagreements civilly. If we ever see or know of any situation involving violence, threats, bullying, or intimidation, we help to protect our coworkers by reporting the incident immediately. If you are concerned about your immediate safety or that of others, contact local authorities in your area before you report the matter internally.

## SUBSTANCE ABUSE

Our commitment to maintaining a safe workplace means we never report to work under the influence of alcohol, illegal drugs, or any other substance that could hurt our ability to do our jobs safely. Use of these substances can prevent us from thinking clearly and can impair our judgment—which could be dangerous to ourselves and those around us. Because of this, our Company does not permit the use, sale, purchase, or distribution of illegal drugs while employed by Owens Corning. The one exception is that alcohol may be served at Company functions. On these occasions, we take care to drink in moderation and maintain our professionalism.

Keep in mind that even prescribed medication can present a problem if it impairs your ability to work safely. Let your manager know if you are taking a medication that could become an issue for workplace safety.

## ENVIRONMENTAL SUSTAINABILITY

We consider the global and local communities where we live and work to be important Owens Corning stakeholders. Therefore, we have established aggressive goals to conserve resources, prevent waste, and reduce greenhouse gases and other emissions. We pursue environmentally sound business practices and work toward continual improvement in our EHS performance and our efforts to reduce our environmental footprint. We encourage our business partners to do the same.

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 may have on the environment are minimized and that the positive impacts from the solutions we provide are maximized. One way we do this is to always perform our due diligence before launching a new product or modifying any manufacturing processes. We also strive to provide our Company's stakeholders with enough information and transparency to understand the safety and environmental aspects of our products and operations, including our performance and our products' contribution to quality of life. Further, we are all accountable for reporting any practice that is harmful to the environment, is unsafe, or does not comply with our Company's policies, applicable laws, or any other rule or regulation.

For more information on this topic, see *Owens Corning's Global Environmental Standards*.



## 2. ACT WITH INTEGRITY

### ANTI-CORRUPTION

Around the world, we are committed to acting with integrity. We believe in the merits of our products and principles, and let those drive our business success. Our commitment to integrity means we abide by all of the anti-corruption laws that apply to us in our various locations, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and the OECD Convention on Combating Bribery.

These laws make it illegal to make or offer improper payments to public officials—which include employees of government-owned enterprises, candidates for political office, and staff at all levels of government. We never make corrupt payments as a means to further our business goals.

### BRIBERY, KICKBACKS, AND IMPROPER PAYMENTS

Bribery is the giving of something of value—including charitable donations, cash, travel expenses, gifts, offers of entertainment, or any other thing of value to the recipient—in order to obtain (or retain) business or some other improper advantage. It is a form of corruption, and therefore not an act in which we take part.

Similarly, we do not accept kickbacks. Kickbacks are the return of a sum received (or due to be received) as part of an agreement to foster or arrange business.

These and other improper payments go against our values, and are against the law. We pride ourselves on always conducting our business lawfully and with integrity.

### FACILITATING PAYMENTS

Facilitating (or facilitation) payments are small payments, usually made in cash, used to expedite routine government actions, such as processing a visa. Although these payments are allowed in some countries, because of the risk for corruption, we do not allow facilitating payments at Owens Corning. If someone requests such a payment from you—or any other improper payment—report the incident and seek guidance from a member of the Legal Department.

For more information, see our *Anti-Corruption Policy*.

### KNOWING YOUR SUPPLIERS

Just as we do not make any improper payments, we cannot retain a third party to do so for us. We hold our suppliers to the same high ethical standards we set for ourselves. For this reason, we conduct third-party due diligence to ensure that the payments we make to our suppliers, distributors, and other agents are legitimate and will not be used for illicit purposes. If any third party is found to be engaging in corrupt acts while working on behalf of Owens Corning, our Company will take swift and appropriate action.

## GIFTS AND ENTERTAINMENT

Business gifts and entertainment are customary courtesies that are intended to build goodwill between business associates. However, it's important that these courtesies do not compromise—or even appear to compromise—our ability to make fair, objective business decisions. In order to maintain our integrity in situations that involve gifts and entertainment, we follow certain guidelines and limitations.

### For our business associates

Any time we exchange gifts with our suppliers, consultants, contractors, or service providers, we should ask ourselves the following questions:

- Is the gift worth more than nominal value?
- Do you frequently receive gifts or entertainment from this business associate?
- Is it solicited?
- Does the gift include discounts, credits, cash or cash equivalents (such as stock)?

If your answer to each of these questions is “no,” then the gift is probably acceptable. If you answer “yes” to any of these questions, you should seek guidance from a member of the Legal Department.

Similarly, entertainment should always be reasonable and proportionate. If entertainment requires travel, costs more than \$500 USD, or occurs frequently, we consider it significant. This means it requires advance written approval from your manager. Keep in mind that, for an event to count as appropriate business entertainment, it must meet these qualifications:

- Both parties must be present
- Business must be discussed
- The event takes place in an appropriate setting
- Our family members or personal guests, other than our spouse or significant other, should not be included at the expense of our business associate

### For our customers

Because of the nature of our business, we take further precautions in our interactions with customers. In these scenarios, gifts and entertainment:

- Should not be offered for the purpose of securing preferential treatment—they may be provided only as a courtesy or to build goodwill.
- Must be nominal in value or customary, such that it could not be viewed as a bribe or kickback. If you feel a larger gift is appropriate, you must have advance approval from both the applicable Business Unit or Process Area Controller and VP, Internal Audit.
- Should comply with the customer's policy. Making sure of this before presenting a gift or an invitation is a courteous thing to do for our customers and can help us avoid embarrassment for everyone.



**Q:** Helene, a sales manager for Owens Corning, has been working closely with Tobias to close a new deal. When the contract is finally signed, Helene and Tobias meet to discuss the first steps for the new business relationship. Upon arrival, Tobias offers Helene a gift basket containing foods that Helene can share with her coworkers and a gift card for a nearby coffee shop in celebration of the signed contract. May Helene accept the gift?

**A:** Although Helene may be able to accept some items in the basket, she may not accept the gift card because it is a cash equivalent. Helene should politely explain this to Tobias and express how much she appreciates the sentiment behind the gift.

If you aren't sure whether a gift or entertainment would be appropriate, try the “public disclosure” test—that is, ask yourself whether public disclosure of the situation would be likely to cause embarrassment to either you or our Company. If so, it is likely that the gift or entertainment would not be appropriate.

If you have questions about what gifts or entertainment will be acceptable, consult your manager or refer to the *Gifts and Entertainment Policy*.



## TRAVEL, ENTERTAINMENT, AND EXPENSE

When we request reimbursement for business expenses, we must ensure that the expenses are necessary, reasonable, and properly documented. Those of us who travel or entertain at Owens Corning's expense must make sure that we know and follow our Company's rules for expense reports. For more information, see our ***Travel, Entertainment and Expense Policy*** and our ***Travel and Entertainment Guidelines***.

## POLITICAL CONTRIBUTIONS

We believe that government depends on participation in the political election process. Therefore, Owens Corning encourages our participation in the political activities of our choice, on our own time and at our own expense. We must keep in mind, though, that we should never imply that Owens Corning supports our personal political activities. Further, we cannot use Company resources for these activities. Similarly, we should never expect Owens Corning to compensate or reimburse us in any way for our personal political contributions.

As an organization, Owens Corning participates in politics when it is legal and appropriate for us to do so. For example, our Company has established a political action committee called the Better Government Fund to make political contributions at the federal, state, and local levels. For more information, see our ***Political Contributions Policy***.

# 3. TREAT OTHERS RESPECTFULLY

## PREVENTING HARASSMENT

We depend on each other's knowledge and support, so it is especially important to treat our fellow employees with respect and dignity. Harassing behavior creates an uncomfortable workplace where people don't trust each other—which keeps us from reaching our goals. For this reason, harassment has no place at Owens Corning and will not be tolerated.

The legal definition of harassment can change, depending on where we're doing business. At Owens Corning, however, harassment is defined as any conduct that threatens, intimidates, or coerces another person. Common examples include:

- Verbal actions such as threats, epithets, slurs, derogatory comments, negative stereotyping, or offensive jokes
- Non-verbal actions such as gestures that ridicule, insult, belittle, or show hostility to an individual or a group
- Distributing or displaying degrading or derogatory posters, photographs, cartoons, drawings, or jokes, whether in written or electronic form. Unwelcome sexual advances, requests for sexual favors, or visual, verbal, or physical conduct of a sexual nature where submission is a condition of employment or used as the basis for employment decisions

Any form of harassment can create an intimidating, hostile, or offensive working environment, and can interfere with work performance. Regardless of whether harassment is committed by a coworker, a manager, or even a non-employee, it will never be tolerated at Owens Corning.

If you have encountered harassment in the workplace, whether you were the target or you know of a situation involving another person, you should report it immediately. Notify your manager, Human Resources Representative, Division Human Resources Manager, or the Business Conduct Council Helpline. Owens Corning will always protect you from retaliation if you make a report in good faith.

For more information, see our ***Non-Harassment Policy***.

**Q:** Recently, some of Julian's coworkers have been telling jokes that involve offensive racial stereotypes and imply that all Latinos in their town are illegal immigrants. Julian is upset and disappointed that these people he usually gets along with would make such tasteless jokes, but he's not sure how to handle the situation without making himself a target. What should he do?

**A:** Julian should talk to his manager or another resource listed in this Code about the behavior that is making him uncomfortable. Julian can rest assured that he will not face retaliation for reporting his coworkers' behavior, as our Company is committed to creating a positive, secure work environment for all of us.

## PROMOTING DIVERSITY

Owens Corning seeks to foster a workplace that embraces differences in viewpoints, cultures, race, and gender. Our differences can help make us a stronger team—the diversity in our opinions and ideas makes us better able to provide innovative solutions for our customers.

Because of this, we never make employment decisions based on legally protected personal characteristics such as race, color, religion, gender, national origin, sexual orientation, disability, veteran or military status, pregnancy, gender identity, or genetic information. Our Company provides equal opportunities based on our skills and abilities, always striving to create a workforce that reflects the diversity of our communities.

For more information, talk to your manager or see our *Equal Opportunity Policy*.

**Q:** Ana is a long time employee of Owens Corning and she feels that she has earned a promotion. However, when she tells her manager why she thinks she is ready for greater responsibility, he frowns and says that because their team is mostly men, he doesn't think the guys would respect her as a leader. What should Ana do?

**A:** Ana should report this conversation to her manager's manager or another resource listed in this Code. Owens Corning never tolerates discrimination based on characteristics like gender, race, or religion, and we should always speak up any time we see a violation of our Company's principles. We all deserve a chance to prove ourselves and to work in a fair, respectful environment.





# 4. RESPECT AND PRESERVE CONFIDENTIAL INFORMATION

## CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

We all play a role in protecting Owens Corning's confidential information and intellectual property. In doing so, we are helping to secure our business strategies and processes as well as our competitive position in the marketplace. Keeping our confidential information and intellectual property safe also guarantees the growth of our businesses and people, leads to new product and process innovations, and creates shareholder value.

Information that conveys something that is not public about any aspect of our business is considered confidential information. Information can be generated by Owens Corning or may be acquired from another party under conditions of confidentiality. We all share the responsibility for keeping Company information secure—and this duty continues after we leave Owens Corning.

We must never use Owens Corning's confidential intellectual property for our own personal profit. For more information on how you can identify and report abuse of Owens Corning's information, see our ***Intellectual Property Policy***.

### **Examples of confidential information:**

- Research and development ideas and findings
- Business plans, strategies, or financial information
- Pricing or cost information
- Contracts and customer lists
- Employees' personal information

The above information is retained in many forms, may be physically- or electronically-stored, and can include physical equipment and processes. If you are not sure whether specific information is confidential, you should err on the side of caution and assume that it is.

### **How can I protect confidential information?**

- Refrain from storing it on USB drives and other removable media when possible
- Never disclose it unless there is a legitimate business reason
- Use secure file transfer methods when there is a business reason
- Never leave your computer or other electronic devices where they could be lost or stolen
- Keep your password secret, and don't let others use your account
- Don't discuss confidential information in places where you might be overheard, such as restaurants, airport terminals, and even Company break rooms

## PERSONAL EMPLOYEE INFORMATION

We each provide certain personal data to our Company, so we all rely on each other to keep that information confidential. Those of us who have access to our coworkers' personal data must not reveal it, even to other employees, except when necessary for legitimate business purposes. This includes:

- Salary and earnings data
- Identification numbers
- Banking and financial information
- Information on health or family issues

If there is a doubt as to whether confidential information should be disclosed, seek advice from your manager or any Owens Corning Intellectual Property Attorney.

## INSIDER TRADING

Our respect for our Company's confidential information extends to making sure we don't misuse it for our personal gain. We may never buy or sell stock in Owens Corning—or any other company—based on “inside information” about that company. In order to make sure we're doing the right thing, we should always be aware of what inside information we may possess. Keep in mind that in addition to being a violation of the Code and Company Policy, the countries where we do business have strict laws against using any company's inside information to trade stock in that company.

For something to count as inside information, it must be both material (meaning that a reasonable investor would consider it important) and non-public. If we know something that no other investor could, it would be unfair for us to profit by that inside knowledge.

Common examples of inside information include:

- Mergers
- Acquisitions or divestitures
- Major new products
- Unusual financings or offerings
- Unexpected financial results

Just as we may not trade based on inside information ourselves, we must also refrain from “tipping,” or sharing inside information with others. If they go on to make trades based on our inside information, we may also be culpable. We must take care to protect inside information until it is publicly released.

These restrictions apply to any transaction in which we would benefit based on the market value of a company's securities. Naturally this includes direct trading—the purchase and sale of stocks—but also to transactions such as charitable gifts of stock.

For more information, see the *Insider Trading Policy* or the *Insider Trading Guidelines*.



## EXTERNAL COMMUNICATIONS

In order to ensure that our Company has a clear, unified voice when it communicates with the public, we make sure that all external communications are handled by the appropriate people. The rest of us must be careful not to make public statements about our Company unless we have permission to do so.

## MEDIA

The media can be a good source of publicity for our Company, but our interactions with the media need to be handled carefully. In the event that you receive a request from a member of the media for information or comment, don't attempt to answer it yourself. Instead, you should forward the request to our Corporate Communications team.

## INVESTOR RELATIONS

Owens Corning has an Investor Relations team that handles all questions or requests for information from current or potential investors. Contact this group if you receive any communication from our investors.

## 5. COMPETE VIGOROUSLY BUT LAWFULLY

### FAIR COMPETITION

We believe that fair competition and an even playing field benefits our customers and gives our products and value proposition a chance to succeed based on merit alone. Our beliefs are supported by the various competition laws (known as “antitrust laws,” in some areas) enacted around the world. These laws prohibit formal and informal agreements between two competing companies for the purpose of unfairly restraining trade. We are proud of Owens Corning’s resolve to comply with both the letter and the spirit of all competition/antitrust and trade practice laws that apply to the locations where we do business.

In order to live up to our continuing responsibility to protect a fair and open marketplace, we must never make any agreement with a competitor that would restrict trade. Any coordination between our Company and our competitors can violate competition laws, even if it is based on an informal agreement.

To be clear, when we interact with competitors, we should never discuss

- Dividing territories or customers
- Fixing the price that we charge for certain products or services
- The discounts, terms, or conditions of sale that we offer
- Boycotting specific customers or suppliers

We are also each responsible for participating in our Company’s periodic antitrust training.

For more information, refer to our policy on *Antitrust & Competition Laws* or the *Antitrust Guide*.



**Q:** David has been discussing product pricing over email with his contact at one of our customers. In one message, he scrolls through all of the previous responses and finds several messages between his contact and one of our competitors. One of them even lays out the competitor’s pricing. Perfect, David thinks, we can easily beat that price. He also thinks about emailing the competitor directly and letting him know that the pricing information was inadvertently disclosed. Is this okay?

**A:** This is a difficult situation, and one in which David should seek help from a manager or member of the Legal Department. While this may not constitute an agreement between our Company and our competitor, it’s clear that this information was not intended to be shared with Owens Corning. The competitive information we receive should be gathered in a lawful, ethical, and transparent way—using confidential data that is inadvertently disclosed to us is hardly fair or ethical. Before contacting the competitor, or using or sharing the pricing information he received, David should report the matter internally and allow Owens Corning to follow up on the situation as appropriate.



## 6. HONOR TRADE RESTRICTIONS

Many of the countries where we conduct business impose trade sanctions, or comply with sanctions imposed by multi-national organizations such as the United Nations or the European Union. Generally speaking, these sanctions restrict or prohibit dealings with certain countries or individuals. They often include restrictions on financial transactions, travel, and imports and exports.

Those of us who handle international business have a duty to understand and follow the most current laws and regulations in the countries where we work. Carefully screening all of our customers and business partners can help us ensure that we are complying with applicable laws. For more information, see our **Trade Restrictions Policy** and **Global Trade Compliance Guidelines**, or consult with a member of the Legal Department if you have questions.

### IMPORT AND EXPORT CONTROLS

As an international company, Owens Corning ships our products and materials across country borders on a daily basis. In all of our business activities, we must obey all applicable laws on imports and exports. Since Owens Corning is based in the United States, we follow U.S. import and export laws and regulations as well as any applicable local laws.

To be clear, an “export” can be any product, software, technology, or piece of information that we ship to another country. Technology, software, or information that is provided to a citizen of another country, regardless of where the person is located can also be considered an export.

Like exports, imports (goods we purchase from an external source and bring into the country) are subject to various laws and regulations. We may be required to submit certain documentation and also pay duties and taxes. Keep in mind that Owens Corning is responsible for verifying the accuracy of import or export information.

We should all be aware and comply with international trade control laws and our Company's policies, especially those of us who sell and distribute our products. If you have additional questions, contact a member of the Legal Department.

### HANDLING BOYCOTT REQUESTS

From time to time, we may receive a request—commonly as part of a contract—to boycott a certain country or company. Under the law, we cannot cooperate with any boycott request that is outside the sanctions described above. For this reason, we do not initiate any action, provide any information, or make any statements about countries, companies, or other entities that could be misinterpreted as cooperating with an illegal foreign boycott. If you receive a request of this kind, you should immediately notify a member of the Legal Department.



# 7. CREATE A NO CONFLICTS CULTURE

## CONFLICTS OF INTEREST

We have a duty of loyalty to each other and to Owens Corning. This means we may not advance our personal interests at the expense of our Company's interests. We can avoid even the appearance of a conflict by disclosing our existing relationships and reporting any situations we're unsure about to our manager, HR representative, or a member of the Legal Department. We must avoid situations that can lead to conflicts of interest, but—more importantly—disclose them so that there is never any impropriety in any of our business dealings.

Some of the more common situations that may lead to conflicts of interest are described in this section. If you need additional guidance, see our *Conflict of Interest Policy*.

## OUTSIDE EMPLOYMENT

As employees, our primary responsibility is to Owens Corning. Although some of us may take on second jobs or run personal businesses, these should never conflict with our duties to our Company. This means we may not work for any company that competes with Owens Corning. Similarly, we may not work for any of Owens Corning's business partners, customers, or suppliers. We may also never use Company resources—including time, name, facilities or equipment—to advance any outside interests or conduct outside business.

## FINANCIAL INTERESTS

Owens Corning does not intend to control our personal finances, and we are encouraged to invest as we see fit. However, we must follow some guidelines to ensure our personal investments do not put us in competition with our Company. For this reason, we may not have a material financial interest (greater than 1% ownership) in any company that competes or does business with Owens Corning.

## WORKING WITH FAMILY MEMBERS

In the workplace, we try to avoid the appearance of favoritism by not having a reporting relationship between immediate family members. "Immediate family" includes your spouse or domestic partner, children, parents, siblings, and in-laws. If you find yourself in this situation, let your manager know, and one family member will be reassigned.

We must also inform our manager, HR representative, or a member of the Legal Department if any member of our immediate family works for a supplier, distributor, or competitor of Owens Corning. If you are in such a situation and your job entails procurement or contracting, you must not participate in supplier selection or contract negotiations. Remember that even the appearance of undue influence can harm our Company.

## CORPORATE OPPORTUNITIES

We have a duty not to compete with our Company in any regard. This means, in part, that we cannot take personal advantage of any business opportunities that we learn of through our employment at Owens Corning, unless our Company has had the chance to review the prospect and has decided not to pursue it. This includes real estate and investment opportunities, among others.

## GUIDELINES FOR DISCLOSING A CONFLICT

If you think you may have a conflict of interest, or you have a good faith suspicion that other Owens Corning employees are in violation of this policy, you should report this to your Manager, Human Resources representative, or a member of the Business Conduct Council or a member of the Legal Department who will refer the report for investigation and resolution. You may also reach out to any other resource listed in this Code, or make a report through our Business Conduct Helpline. Remember that having a conflict of interest isn't necessarily a violation of our Code, but failing to disclose such a situation is.

**Q:** Tony needs to find a new regional distributor for Owens Corning and his daughter Jamie has just joined a trucking company that does business in that area. Tony thinks that this sounds like an easy solution, and is proud to be able to give his daughter's new company some business. Is this okay?

**A: No. Even if this distributor is the best choice for our Company right now, Tony must never favor Jamie's company over others just because she works there. In order to make sure this conflict doesn't become a problem, Tony needs to disclose the situation to his leader, who can decide if the business relationship should be handled by someone else. This is no reflection on Tony's character or capabilities—we always avoid situations that appear to be conflicts just as if there were an actual conflict.**

## 8. KEEP ACCURATE RECORDS

### FINANCIAL REPORTING

Owens Corning maintains a wide variety of records, from complicated financial records to mundane expense reports or timekeeping records. Our Company relies on all of these records to plan for the future and to provide our investors, business partners, and the government with complete, understandable information about our business. This is why it is critical that we ensure all of our Company's records are kept honestly and accurately. This is also why we are each responsible for reporting any inaccurate, incomplete, or fraudulent entries we may find.

We also make sure to be both accurately and timely when we respond to any external reporting requirements, such as periodic filings with the Securities and Exchange Commission. If you believe that information our Company has provided to the government or an internal or external auditor is somehow incomplete, inaccurate or otherwise misleading, it's your duty to report it to your manager or to VP, Internal Audit. For more information, refer to the **Company Accounting Records Policy**.

### RECORDS MANAGEMENT

We build trust with our customers, regulators, and shareholders by ensuring all of our records are created and maintained systematically so that we can find the information we need promptly. This applies equally to all kinds of documents, whether they are paper, imaged, electronic, or email.

We follow the records management policies and retention schedules in all the locations where we operate. We also observe any legal holds and preserve all records related to specific topics as requested by the Legal Department. We never destroy or tamper with our Company records prior to their expressed expiration in the retention schedule. If you have questions about matters related to records retention, please contact your manager or another point of contact in this Code. For more information, see our **Records Management Policy**.

### RESPONDING TO AUDITS AND INVESTIGATIONS

We fully comply with any requests from our internal and external auditors and provide them with the most accurate and timely information. We never mislead or attempt to influence any investigation, audit, or inquiry.

## 9. ENSURE THAT COMMITMENTS ARE PROPERLY MADE

### CONTRACT MANAGEMENT

Over the years, our hard work has created Owens Corning's good reputation and the trusted relationships we have with customers and suppliers around the world. When we make commitments on our Company's behalf, we always want to be sure that we will be able to follow through on our promises. For this reason, it is crucial that in any situation where we bind our Company or create a legal obligation, every aspect must be properly approved and recorded.

When we enter into a commitment, we must follow the **Levels of Authority Policy**. This policy details the appropriate approvals—review and signatory—for any action that will bind our Company. Before we execute a document, we must be absolutely certain that the proper reviews are complete and signature authority is granted.

Any time you enter into a transaction on our Company's behalf, ask yourself these questions:

1. Have all required corporate review approvals and sign-offs been obtained?
2. Has the transaction been approved or signed by someone with the proper signature approval?
3. Do I have the authority to execute these documents and bind the Company?

You should only proceed if the answer to all three questions is "yes." If you have any questions, contact a member of the Legal Department or Contract Administrator. For more information, see our **Levels of Authority Policy**.



## USE OF COMPANY ASSETS

Just as we should not commit Company resources unless we have the proper authority to do so, it is also important to protect Company property from theft, waste, and misuse. Owens Corning owns a variety of assets that are essential to our success and our ability to compete in the market. This includes our confidential information (see “Confidential Information and Intellectual Property”) as well as physical assets such as facilities, vehicles, equipment, computer systems, resources, and records.

## 10. PROPERLY USE COMPANY ELECTRONIC SYSTEMS

### COMPANY COMPUTER SYSTEMS

Just as we have a duty to protect our Company’s assets, we share an obligation to use Owens Corning’s computer resources, networks, and Internet and email systems responsibly. Our Company provides these resources for business purposes, so we make sure that any occasional personal use of the Internet or the Company email system are minimal and appropriate. We must never use Company computer systems and technologies to download, view, or send material that is illegal, offensive, or sexually explicit.

All information, data, and files on the Owens Corning network belong to our Company, and—to the extent permitted by applicable law—Owens Corning reserves the right to monitor or disclose any messages, documents or any other files on Company computers without notice. For more information, see our *Use of Electronic Systems Policy*.

### SOCIAL MEDIA

Owens Corning understands that we have the power to engage with our stakeholders through various social media. However, when using these resources, we must keep in mind that electronic messages are permanent, transferable records of our communications. They can be altered without our consent, and can affect our Company’s reputation if released to the public. Therefore, we are expected to follow all Company policies and procedures when using social media. Never speak or act on our Company’s behalf unless authorized to do so.

If you are aware of or suspect the inappropriate use of Owens Corning technologies or electronic communications, tell your manager immediately. If you have any questions about who may communicate on a given issue, or whether a message is appropriate, please see the “Social Media” section of our *Use of Electronic Systems Policy*.

## WAIVERS

In some cases, our Company may waive compliance with this Code. Such waivers will only be granted on a limited basis, and will be considered case by case. The Board of Directors or the Governance and Nominating Committee of the Board of Directors may issue a waiver of this Code for a member of our Board or an executive officer. Any waiver of this Code for a member of our Board or an executive officer will be promptly disclosed as required by applicable law, Securities and Exchange Commission rules and regulations, and the New York Stock Exchange (NYSE) listing standards.



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# Supplier Code of Conduct

## Purpose and Expectations

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The Owens Corning Code of Conduct reflects our commitment to doing business with integrity. At Owens Corning, integrity means our conduct is true to our words; we adhere to the letter and spirit of all applicable laws, regulations and policies. We pride ourselves in doing business ethically, avoiding even the appearance of impropriety. We expect that our business partners will share our ethical principles and adhere to this Supplier Code of Conduct ("Code").

This Code has been developed to incorporate the principles of Owens Corning's Code of Conduct as well as international norms on human rights and the protection of the environment. The Code outlines the expectations that we have regarding the operations of our Suppliers, and addresses the principles found in the United Nations Global Compact for which Owens Corning is dedicated to incorporating as a signatory.

Owens Corning defines "Suppliers" as any organization or entity that directly provides goods and/or services to Owens Corning. The Code is meant to act as a reference during our selection and retention of all Suppliers that provide goods or services supporting our operations worldwide. While Owens Corning understands and respects that there are different legal and cultural environments in which our Suppliers conduct their operations, this Code will provide our Sourcing Organization with a foundation to assist in contracting decisions and Supplier selection, and a framework by which to hold our Suppliers accountable to the Guiding Principles and international norms. In an effort to create a responsible and effective supply chain, Owens Corning will seek business partners who share the same commitment to human rights and our Guiding Principles.

Owens Corning is dedicated to the continuous improvement of this Code. The Code 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.

## Legal Compliance

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Suppliers are expected to comply with all applicable legislation, including laws, regulations and legal requirements on human rights, labor, the environment, anti-corruption, and trade and customs. The Code also references international norms, such as International Labour Organization (ILO) Conventions. Owens Corning expects the Supplier to comply with country-specific or local legislation, the international norms explicitly referenced in the Code, or Owens Corning's-specific standards, whichever standard is higher. Should conflicts arise between local legislation and international norms or Owens Corning-specific standards, the Supplier is expected to notify Owens Corning.

## Environmental, Health, Safety & Product Stewardship

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The operations of our Suppliers must comply with all applicable environmental, health and safety laws, regulations and legal requirements in the countries in which they operate.

Suppliers are expected to provide:

- Their employees with a safe, clean, and healthy work environment and living environment, if Suppliers provide employees with accommodation



# Supplier Code of Conduct

- Their employees with adequate training related to health, safety, product stewardship and the environment
- Adequate management systems for environmental, health and safety, and product stewardship programs
- Products that are safe and environmentally sound to use and dispose of
- Products that perform as claimed
- Useful information on the performance and safe use of their products and
- Programs to reduce the environmental impact of their products such as:
  - Optimization of energy consumption with a view to reducing greenhouse gas emissions
  - Optimization of consumption of natural resources
  - Reduction of quantities of waste released and development of reclamation and recycling solutions, and
  - Reduction of discharges into natural surroundings and other sources of pollution.

Suppliers are expected to establish goals and monitor the reduction of their environmental footprint.

In procuring raw materials, suppliers are expected to verify that all materials used in the manufacture of Owens Corning products or sale of products to Owens Corning were sourced in compliance with all applicable environmental laws, regulations and legal requirements.

To ensure safe handling, movement, storage, recycling, reuse, and disposal, Suppliers are expected to identify and manage substances that pose a hazard if released to the environment and comply with applicable labeling laws and regulations for recycling and disposal.

## Raw Materials Procurement – Conflict Minerals

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Owens Corning does not tolerate the use of raw materials that directly or indirectly contribute to armed conflict or human rights abuses in any of its products.

At a minimum, the supplier is expected to:

- Have a policy that addresses the responsible procurement of conflict minerals (currently defined in section 1502(e)(4) of the Dodd Frank Wall Street Reform Act)
- Train appropriate personnel on this policy
- Implement a risk assessment (supply chain mapping) of all conflict minerals sources and
- Develop an appropriate risk mitigation strategy for those suppliers identified as “high-risk” in the supply chain mapping exercise.

Owens Corning encourages the supplier to verify the supply chain due diligence practices of their suppliers in regards to conflict minerals and to join or build partnerships with industry organizations implementing due diligence in the mineral supply chain.

## Employment Standards

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Suppliers are expected to hire, compensate, provide benefits and access to training, promote, terminate and/or retire employees without regard to race, color, religion, national origin, political affiliation, union



## Supplier Code of Conduct

membership, marital status, pregnancy, age, disability, gender, gender identity, sexual orientation, or any other characteristic unrelated to the ability to do a job.

Suppliers are expected to provide their employees with compensation benefits and working hour schedules in compliance with all applicable laws and collective agreements.

Suppliers are expected not to employ child labor. Owens Corning will not knowingly engage a Supplier that directly or indirectly through a third party employs child labor on the Supplier's premises. We define "child labor" as 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. Owens Corning supports the participation in legitimate workplace apprenticeship programs, as long as they comply with all applicable laws and are consistent with Articles 6 and 7 of the ILO Minimum Age Convention No. 138 on vocational or technical education and light work. If children below the legal working age are found in the workplace, suppliers are expected to take measures to remove them from work and to help seek viable alternatives and access to adequate services and education for the children and their families.

Suppliers are expected to comply with all legal requirements for the work of authorized young workers (workers under the age of eighteen (18)), particularly work that is likely to jeopardize the health or safety of those young workers. It is expected that specific attention will be paid to requirements pertaining to hours of work, wages, working conditions, and the handling of certain materials.

Suppliers are expected not to employ forced, slave, convict or bonded labor. Owens Corning will not knowingly engage a Supplier that directly or indirectly through a third party employs forced, slave, convict or bonded labor on the Supplier's premises. In accordance with Article 2 of the ILO Forced Labour 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. Owens Corning defines "convict" labor as 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.

Suppliers are expected to not employ persons who were trafficked into employment on the Supplier's premises or engage in human trafficking, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime.

While Suppliers may favor or encourage a self-represented work force, Suppliers are expected to:

- Allow employees the freedom 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
- Allow alternative means of worker representation, organization, ability to address grievances and resolve disputes, if freedom of association and collective bargaining is lawfully restricted.





# Supplier Code of Conduct

Employees of Suppliers are expected to work in an environment free from harassment and abuse, including, but not limited to, sexual and physical harassment and psychological, verbal and physical abuse.

If disciplinary procedures are practiced by Suppliers, the procedures are expected to be

- In compliance with all applicable legislation
- Applied in a standardized fashion and
- Documented in a policy on which all members of management are trained and of which all employees are informed upon hire.

## Grievance Mechanisms

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Suppliers are expected to introduce an adequate system to address employee grievances and resolve disputes that:

- Protects the employee's privacy and allows for anonymous reporting of grievances
- Protects the employee against retaliation
- All members of management are trained on and
- Is communicated to all employees.

## Conflicts of Interest, Gifts and Entertainment

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Owens Corning is committed to ethical business practices. Conflicts of interest - in practice or in appearance - run counter to fair treatment and good procurement policies. Our Suppliers are expected to know that Owens Corning employees are directed to avoid any relationship, influence, or activity that might impair, or appear to impair, Owens Corning's ability to make objective business decisions. Owens Corning employees must identify situations that could bias, or appear to bias, buying decisions. Owens Corning employees who buy goods or services directly, or are otherwise involved in the procurement process, shall refrain from the following:

- The solicitation of any gift, excessive entertainment, or favor of any significant value.
  - Excessive entertainment to include that which: requires travel; has cash value greater than \$500; occurs frequently; is provided for the exclusive benefit of the employee without Supplier participation; is provided where no business is conducted; includes family members or guests of the employee (outside of spouse or significant other) at the expense of the Supplier.
- The receipt of a product or service constituting more than a modest social amenity or normal supplier sales promotion which may appear to be capable of influencing the employee's decision.

Owens Corning employees may accept unsolicited meals, refreshments, or entertainment of reasonable value on an infrequent basis in connection with normal business discussions.

Suppliers are expected to respect the limitations placed on Owens Corning employees, as stated above, and refrain from putting them in an uncomfortable situation by offering them gifts or other favors that they may not accept.



# Supplier Code of Conduct

## Anti-Corruption

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Suppliers to Owens Corning are expected to fully comply with all Anti-Corruption laws, including but not limited to the United States Foreign Corrupt Practices Act of 1977 (FCPA), the UK Bribery Act, and the OECD Convention on Combating Bribery.

We expect that our suppliers will not directly or indirectly offer, pay, promise to pay, or authorize the payment of any money, or offer, give, promise to give, or authorize the payment of any money, or anything else of value to any person, including any official or employee of any government, or any person acting in an official capacity for or on behalf of any such government for the purpose of

- Influencing or rewarding any act or decision of such person, official, employee, party or candidate, or
- Inducing such person, official, employee, party or candidate to do or omit to do any act in violation of his or her lawful duty, or
- Inducing such official, employee, party or candidate to use its or his influence with a foreign government or instrumentality thereof to affect or influence any act or decision of such government or instrumentality, or
- Securing any improper advantage for the Supplier.

Similarly, Owens Corning prohibits the use of facilitating (or facilitation) payments and we expect our suppliers to never make such payments on Owens Corning's behalf.

## Antitrust & Competition Laws

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Suppliers are expected to be in compliance with both the letter and the spirit of all antitrust/competition and trade practice laws. These laws include federal and state antitrust and trade practice laws in the United States as well as the legal provisions applicable to competition and trade practices in each of the other countries where the Supplier operates.

## Trade and Import Restrictions

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Suppliers are expected to comply fully with all applicable United States trade laws and customs regulations as well as those laws applicable in the countries where they do business. Applicable United States trade laws and customs regulations include such matters as: country of origin labeling, U.S. embargoes, sanctions, export controls, and restrictions on doing business with "specially designated nationals" and "blocked persons". The U.S. government maintains and updates almost daily lists of such "specially designated nationals" and "blocked persons" with whom business dealings may be prohibited or severely restricted under U.S. law. A copy of this list is available at <http://www.treas.gov/offices/enforcement/ofac/sdn/>.

Suppliers taking part in any international transactions are also expected to become C-TPAT certified, maintain an equivalent supply chain certification through their government or local customs authorities, or verify they meet the minimum security standards which can be found at [www.cbp.gov](http://www.cbp.gov).



# Supplier Code of Conduct

## Subcontracting

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Suppliers are expected to hold their subcontractors and suppliers accountable to principles in line with this Code.

## Communication

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Suppliers are expected to adequately communicate the elements of this Code or a comparable Business Conduct Policy to its leadership, its employees and its subcontractors and suppliers.

## Monitoring and Compliance

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Owens Corning maintains the right to take actions, including inspections of the Supplier's facilities and worker accommodations and review of any applicable documentation to ensure our Code has been implemented and is being followed by our Suppliers. Suppliers are expected to keep accurate records to prove compliance with the Code. It is the expectation of Owens Corning that our Suppliers will take corrective actions within a time frame jointly agreed upon by the Supplier and Owens Corning to remedy any identified noncompliance.

An independent line of communication is provided for Suppliers to address infractions or the inability to adhere with this Code of Conduct due to the actions of an Owens Corning employee through the independent Business Conduct Help Line at +1-800-241-5689 or collect to +1-770-263-4741.

## Contact Information

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Should you have any questions or require a hardcopy version of this Code, please do not hesitate to call 1.800.GET.PINK, discuss with your Owens Corning account representative or write to this email address: [sustainability@owenscorning.com](mailto:sustainability@owenscorning.com)

## Document History

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Version 1.0: Released June, 2010

Version 2.0: Released June 2012

Version 2.1: Released March, 2013

Version 3.0: Released June, 2016



# Supplier Code of Conduct

## References

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- United Nations Global Compact  
[www.unglobalcompact.org](http://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/>
- International Labour Organization  
<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  
<http://www2.ohchr.org/english/law/slavetrade.htm>
- Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime  
<http://www2.ohchr.org/english/law/protocoltraffic.htm>
- OECD Due Diligence Guidance for Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its supplements  
<http://www.oecd.org/dataoecd/62/30/46740847.pdf>
- United States Department of Justice – Foreign Corrupt Practices Act  
<http://www.justice.gov/criminal/fraud/fcpa/>
- The UK Bribery Act Overview  
<http://www.fco.gov.uk/en/global-issues/conflict-minerals/legally-binding-process/uk-bribery-act>
- OECD Convention on Combating Bribery of Foreign Officials in International Business Transactions  
[http://www.oecd.org/document/20/0,3343,en\\_2649\\_34859\\_2017813\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/document/20/0,3343,en_2649_34859_2017813_1_1_1_1,00.html)
- U.S. government lists of such “specially designated nationals” and “blocked persons”  
<http://www.treas.gov/offices/enforcement/ofac/sdn/>
- C-TPAT and US Customs and Border Protection security standards  
[www.cbp.gov](http://www.cbp.gov)