



Owens Corning Business Conduct Policy

Workplace Standards Non-Discrimination and Non-Harassment

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Intent

It is the Company's intent to provide equal employment opportunities to all candidates and employees, to make employment decisions that are free from bias, and to provide a workplace free from harassment or discrimination. The company believes that providing equal opportunities to all candidates and employees will help us become more diverse, and believes that when employees treat each other with respect it enables productivity, makes our workplace more inclusive, minimizes disputes, and enhances our reputation.

All leaders, managers, and employees play a role in making Owens Corning an inclusive and diverse place to work, free of harassment and discrimination, for everyone. Please read this policy and make every effort to help enable this intent together.

The Policies below should enable this intent and constitute the minimum global standard when it comes to Equal Opportunities and Non-Harassment. Each Owens Corning facility can choose to create additional standards of excellence when it comes to appropriate employee interactions provided that no facility may in any way diminish the standards set forth in the Policies below.

Policy – 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 individuals 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, sex, gender identity, sexual orientation, national origin, age, veteran or military status, marital 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).

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.



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Policy – Non-Harassment

It is the Company's intent that all employees will work in an environment free from harassment on any basis including, but not limited to, harassment on the basis of race, color, sex, age, national origin, veteran or military status, pregnancy status, sexual orientation, gender identity, cultural affiliation, religion, genetic information, physical or mental disability, personal characteristics or circumstances, or any other characteristic protected by applicable law.

Employees at all locations worldwide and at all levels of the Company have the responsibility to avoid any act or actions, implied or explicit, that may suggest any form of harassment of any other person within the workplace, or in a work setting. This includes contractors, vendors, consultants, customers, and other non-employees, such as visitors, who have reason to be engaged in business with Owens Corning.

The Company will actively investigate any allegation of harassment, evaluate the conduct and the context of the behavior, and take appropriate action.

To the extent that this Policy conflicts with the local laws of any country, such laws shall govern.

Definitions

Harassment is verbal or physical conduct designed to threaten, intimidate, or coerce. Examples of harassment include:

- Verbal: Threats, epithets, slurs, derogatory comments, negative stereotyping, or offensive jokes.
- Non-verbal: Distribution, display or discussion of any written, electronic, or graphic material (such as derogatory posters, photographs, cartoons, drawings) or gestures that ridicule, denigrate, insult, belittle, or shows hostility or aversion toward an individual or group.

Sexual harassment consists of unwelcome sexual advances, requests for sexual favors, or visual, verbal, or physical conduct of a sexual nature when:

- Submission to the conduct is made an explicit or implicit condition of employment; or
- Submission to or rejection of the conduct is used as basis for employment decisions affecting the individual; or
- The conduct has the purpose or effect of unreasonably interfering with the employee's work performance or creating an intimidating, hostile, or offensive working environment.



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Examples of conduct that may constitute sexual harassment are:

- Verbal: Sexual innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks, threats, requests for any type of sexual favor.
- Non-verbal: Unwelcome, unwanted physical contact. The distribution or display of any written, electronic or graphic material, including calendars, posters, and cartoons that are sexually suggestive, or show hostility toward an individual or group because of sex. Suggestive leering, staring, whistling, obscene gestures or letters, notes, facsimiles, and electronic communications where the content is sexual in nature.

Procedure – Equal Opportunity, Non-Harassment, Retaliation

- Complaint Procedure: If an employee feels there has been a violation of this Policy, he/she should immediately notify his/her Supervisor, Manager, designated Human Resources Representative, Division Human Resources Manager, or the Business Conduct Helpline
- Investigation Process: All complaints of Policy violations that are reported will be investigated promptly, in an impartial manner, and as confidentially as possible. The Company will undertake or direct a thorough and objective investigation of the allegations. Employees are expected to cooperate in any workplace investigation, including but not limited to the accuser, the accused, and potential witnesses.
- Obligations of Managers and Supervisors: Managers or Supervisors who are advised of a problem or incident that may violate this Policy shall immediately advise their Human Resources Representative of the situation so appropriate action can be taken.
- Investigation Results: Where deemed appropriate by the Company or where required by law, the results of an investigation will be communicated to the employee who complained and to the accused Policy violator. If the Company determines that prohibited conduct occurred, the Company will take effective remedial action immediately, as it deems appropriate. Action will also be taken to deter any future Policy violations.
- No Retaliation: No hardship, no loss of benefits, and no penalty may be imposed on an employee as punishment for filing a good faith complaint of a Policy violation, responding to a complaint, 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, up to and including termination.

Questions concerning whether any particular conduct might constitute harassment or retaliation should be directed to your Supervisor, Manager, designated Human Resource Representative, Division Human Resources Manager or the Business Conduct Helpline.



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Responsibility

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

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

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