

Supplier Code of Conduct

Effective February 2023

I. INTRODUCTION

Johns Manville (**JM**) is committed to maintaining the highest standards of ethical behavior in our business conduct, activities, and relationships. At all times and in all situations, ethical behavior must supersede all other considerations. JM expects the same commitment from its Suppliers¹ to uphold and communicate the standards and expectations set forth in this Supplier Code of Conduct (**Code**) within their own business operations and throughout their supply chain.

JM expects you, as our Supplier (**You**), to not only fully comply with applicable laws, but also to support, embrace, and enact internationally recognized environmental, social, and corporate governance standards, based on the 10 principles of the United Nations *Global Compact* initiative, the United Nations *Guiding Principles and Human Rights*, and the International Labour Organization's *Declaration on the Fundamental Principles and Rights at Work*.

Compliance with this Code is mandatory to maintain a business relationship with JM.

II. LEGAL COMPLIANCE FOR BUSINESS INTEGRITY

JM is committed to compliance with all applicable laws in every country where we do business, and expects You to:

- Strictly comply with all **applicable national and international laws and regulations**, including:
 - antibribery and anticorruption laws,
 - competition and antitrust laws,
 - economic sanctions regimes, and
 - international trade laws and trade controls
- Implement and maintain appropriate **management systems or controls** to facilitate compliance with applicable laws, regulations, and standards
- **Prohibit all forms of bribery**, corruption, and money laundering – including gifts to private individuals or public officials that present even the appearance of trying to influence business decisions or inducement to act contrary to obligations
- Respect the **intellectual property** of business partners
- Protect and respect the **privacy and confidentiality** of JM's data and all individuals whose data You may collect

¹ “**Suppliers**” refers to any third party that provides goods or services to Johns Manville including direct and indirect suppliers, labor providers, logistics providers, service providers, and subcontractors of JM Suppliers.

- Provide **guidance and training** to ensure employees understand the principles articulated in this Code as well as applicable laws, regulations, and recognized standards

III. RESPECT FOR HUMAN RIGHTS

JM is committed to a humane, diverse, and inclusive workplace free from discrimination, harassment, coercion, and any form of violence. You are expected to, throughout your organization (and supply chain where feasible):

- Protect internationally recognized **human rights** by ensuring that You are not, directly or indirectly, using forced labor (including modern slavery and human trafficking) or child labor of any kind
- Ensure **freedom of association** and the right to collective bargaining in accordance with applicable law
- Foster a **respectful, inclusive work environment** free from discrimination, unequal treatment, harassment, abuse, or inhumane treatment against anyone (for example, because of ethnic or national origin, race or color, religion, gender, sexual orientation, gender identity and/or expression, age, physical or mental disability, political or union affiliation, maternity, marital status, or any other characteristic protected by applicable law)
- Enable employees and other stakeholders to **report concerns** and potentially unlawful practices at the workplace
- Comply with **minimum wage and working hours** laws and ensure compensation of a living wage appropriate to local living conditions
- Fulfill your due diligence obligations on mineral supply chains to ensure you are not using **conflict minerals**²

For information on JM's *Supplier Diversity and Inclusion Policy* please click [here](#).

IV. HEALTH, SAFETY, AND ENVIRONMENTAL PROTECTIONS

Suppliers should ensure that they are protecting—in all their operations, products, and services—the health and safety of all employees and community members and strive to minimize Your impact on the environment. In particular, JM expects that you:

- Comply with all applicable **environmental, occupational health, and safety regulations** and international conventions on environmental standards
- Ensure **product quality and safety** meet applicable requirements by using effective management systems and controls
- **Protect the health and life** of Your employees and communities against hazards that may result from your processes and products
- **Promote the safe and environmentally sound** development, manufacturing, transport, use, and disposal of your products
- Wherever possible use **environmentally friendly** technologies and **energy efficient** methods to reduce waste and harmful air, water, and soil emissions
- **Prohibit the unlawful eviction** and taking of land, forests, and waters
- **Provide information** sufficient for JM to make hazard communication and regulatory determinations about our products

² Please see Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Countries.

V. SECURITY OF JM ASSETS AND DATA

You may, while performing work for JM, have access to confidential and proprietary information, trade secrets, other intellectual and informational property (including patents, copyrights, inventions, and other discoveries), and personally identifiable information of JM's employees, customers, or other third parties. JM requires that You:

- Comply with all legal and ethical obligations to preserve the privacy, confidentiality, and security of such information
- Maintain a cybersecurity program designed to prevent unauthorized access to, and maintain the security of, your own computer systems, networks, and information to prevent the unauthorized access to, and to maintain the security of, JM's computer systems, networks, and information
- Adhere to industry-leading cybersecurity practices concerning data encryption, website management, remote access, email security, and proactive systems monitoring
- Immediately notify JM of any suspected or actual unauthorized access to Your or JM's computer systems, networks, or information by emailing JMCyberSecurity@jm.com

Suppliers of certain critical products and services are subject to further technical requirements, as applicable.

VI. GIFTS, ENTERTAINMENT, AND CONFLICTS OF INTEREST

JM recognizes that goodwill is critical to building successful business relationships, and the occasional exchange of gifts or entertainment may occur. Nevertheless, decisions must be made based on what is best for the company, not for any individual, and therefore JM requires You to:

- Ensure that all **gifts and entertainment** are:
 - reasonable in value (please note that cash and cash equivalents like gift cards are strictly prohibited)
 - offered pursuant to a legitimate business purpose
 - infrequent, and
 - do not attempt, or present the appearance of attempting, to influence an individual's judgment
- Disclose to JM any actual or potential **conflicts of interest**, including having:
 - a significant financial interest in a JM competitor
 - access to JM proprietary information while providing goods or services to a JM competitor
 - family members or others with whom You have a close personal relationship at JM

You can report an actual or potential conflict of interest by emailing Compliance@jm.com.

VII. ACCOUNTABILITY

Johns Manville may conduct periodic audits or assessments to ensure Your compliance with the spirit and intent of this Code. JM does not assume oversight or direct responsibility for its Suppliers by conducting such assessments. JM reserves the right to discontinue any Supplier relationship for failure to adhere to international principles, failure to correct violations, or patterns of non-compliance with these standards.

You must notify Johns Manville of and promptly remedy any violation of this Code. You may provide notice by emailing Compliance@jm.com.

If you have any concerns about illegal or improper conduct in connection to Your relationship with JM, please reach out to your JM contact, email Compliance@jm.com, or submit a report via the Berkshire

Hathaway Ethics and Compliance Hotline at www.brk-hotline.com. Reports will be treated as confidential to the extent allowed by law. JM prohibits retaliation for good faith reports of suspected misconduct.

Document Management

Policy Name	Supplier Code of Conduct
Policy Owner	Global Procurement & Logistics
Approved By	Vice President, Global Procurement & Logistics
Applies To	Johns Manville Suppliers
Original Effective Date	2009 (JM Supplier Guidelines)
Date Policy was Last Reviewed	February 2023
Supersedes	JM Supplier Guidelines
Contact for Questions	Compliance@jm.com
Related Documents	https://www.jm.com/en/our-company/for-our-suppliers/