

The California Transparency in Supply Chains Act

The California Transparency in Supply Chains Act of 2010 (hereinafter the “Act”) requires certain companies manufacturing or selling products in the State of California to disclose their efforts to eradicate forced labor and human trafficking from their direct supply chains for goods they offer for sale. GAF and its subsidiary companies fully support the purpose and goals of the Act and oppose the use of child labor, slavery, or human trafficking in the manufacture and distribution of our products. We are continually exploring effective methods to ensure compliance with the Act and eliminate the presence of child labor, slavery, or human trafficking in our supply chain.

In compliance with the Act, GAF makes the following disclosures:

- We do not use forced or involuntary labor, and we comply with all applicable child labor laws. We have adopted a [company policy](#) concerning our commitment to comply with all applicable child labor and forced labor laws.
- Our supplier agreements, as well as the terms and conditions found in our standard purchase orders, require our suppliers to comply with all applicable laws. To further our efforts to ensure our suppliers are compliant, we have published a [Supplier Code of Conduct](#) that applies to our suppliers and sets forth our expectations regarding our specific commitments against the use of child labor, slavery, and human trafficking.
- We are continuing to examine potential processes that identify, prevent and mitigate the impact of forced labor in our supply chain. We maintain open lines of communication with our suppliers, managers, employees, investors, customers, and other stakeholders on a regular basis. Our expectations regarding their compliance with applicable laws are an important part of this communication. We are also considering how to properly provide training on our expectations regarding compliance with child labor, slavery and human trafficking laws, as well as measures we are taking to ensure monitoring of risks associated with the same, to our employees and managers with direct responsibility for our purchasing/supply chain.
- We periodically conduct risk assessments of each of our direct suppliers to our California facilities. Any supplier identified internally as “high-risk” will be subject to further review by the company. This review will include the development of an appropriate plan for monitoring and correcting any possible concerns regarding the supplier’s processes. As part of this review, we will consider requiring the supplier to certify that the products provided by them, and the materials incorporated into those products, are manufactured in compliance with our company’s expectations and with the child labor, slavery, and human trafficking laws in the countries in which the suppliers do business. For certain high-risk suppliers, we will also consider engaging an independent third party to conduct an unannounced audit of the supplier and its compliance with child labor, slavery and human trafficking laws.