



The California Transparency in Supply Chains Act of 2010

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 (if any) 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. Indeed, GAF is fully committed to the manufacture and sourcing of products from within the United States, wherever possible. 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 particular,

- 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 compliance with all applicable child 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. We are evaluating additional ways to ensure our suppliers are complying with 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 plan to conduct a risk assessment 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. Measures to be considered will include requiring a certification from the supplier that the products provided by them, and the materials incorporated into those products, are manufactured in compliance with our company's expectations and the child labor, slavery, and human trafficking laws in the countries in which the suppliers do business. In addition, although our current audits of suppliers are more general in nature, we would consider the role of more targeted audits of "high risk" suppliers' compliance with child labor, slavery and human trafficking laws.