

TAMKO's Statement of Policy on Safety





TAMKO'S STATEMENT OF POLICY ON SAFETY

TAMKO'S system for protecting health and safety in the workplace will be known as the Gateway to Safety System ("Gateway"). It will be led by management with full participation by employees in an effort to eliminate injuries and health hazards and to establish a culture where the expectation is zero safety incidents, a Zero Incident Safety

Culture ("ZISC"). TAMKO will have no priority in conflict with protecting the health and safety of each employee in the workplace. TAMKO's goals are to establish (1) a world class safety culture above and beyond minimum legal requirements, and (2) 100% compliance with safety laws and regulations by 100% of its employees, 100% of the time.

Managers at every level are responsible for successful implementation and operation of Gateway. Responsibility for Gateway cannot be delegated to non-managerial employees; however, employee participation is required and must be actively solicited. Support for and compliance with Gateway is required of every employee.

TAMKO'S ZISC will be marked by the implementation of best practices and processes and constant awareness of the need to continuously improve management of hazards to health and safety in the workplace. Employees at every level shall have no duty or goal in conflict with guarding their fellow employees against health and safety hazards.

TAMKO'S Corporate Environmental, Health & Safety Department ("Corporate EH&S") is dedicated to the protection of worker health and safety and will support TAMKO facilities and their leadership in every workplace in the operation of Gateway. Corporate EH&S has authority to obtain the services of experts and professionals from outside TAMKO as needed to support Gateway.

The leaders of each facility in conjunction with the responsible officer and Corporate EH&S will develop a process by which each facility will keep the responsible officer and Corporate EH&S informed about the operation of Gateway and results of its implementation. The responsible officer shall assess each TAMKO manufacturing facility's management of Gateway. Corporate EH&S will independently assess the management of Gateway at all facilities and shall regularly report to the Chief Compliance Officer who will report to TAMKO's Chief Executive Officer.

With the assistance of Corporate EH&S, each facility will develop specific policies for the operation of Gateway.

The policies shall:

- be living documents, subject to revision as needed

- be consistent with this policy statement
- address needs specific to the facility
- describe such goals and objectives as the facility may identify from time to time

Goals identified by a facility shall be specific and a measurement method for charting progress towards each goal will be included.

An essential element of each facility's policy shall be the written description of a process by which any employee in the workplace can communicate a complaint concerning safety and receive a response. The process shall identify appropriate management at the facility to receive such complaints and in addition (and as an alternative), shall permit and provide for communication directly to the Chief

Compliance Officer, the Corporate Human Resources Department and/or the Legal Department. A person will be designated to be responsible for coordination of health and safety practices and operation of Gateway at each facility. The position shall be known as "Safety Coordinator," and each Safety Coordinator shall be qualified by training or experience to lead in the operation of Gateway. Other duties of the Safety Coordinator shall neither conflict with nor be permitted to take priority over Gateway.

TAMKO Building Products LLC

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Chairman and Chief Executive Officer

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INTRODUCTION

Putting the Gateway to Safety System (“Gateway”) into effect requires application of its principles to the wide variety of workplaces within TAMKO. Although TAMKO is primarily a manufacturing company, the six major elements of Gateway will be implemented as applicable, appropriate and necessary in every TAMKO workplace, including warehouses and offices, whether operated by TAMKO or by a subsidiary.

The term “Facility Manager” refers to the General Manufacturing Manager or “plant manager” at manufacturing plants and to the warehouse manager at warehouses not co-located with manufacturing plants. Sales and customer service offices and other corporate employees on site at a manufacturing plant or warehouse facility will be subject to the Facility Manager for Gateway implementation.

The term “Responsible Corporate Officer” refers to the corporate officer to whom Facility Managers report. For the corporate offices, warehouses and other nonmanufacturing facilities, and for facilities operated by a subsidiary or a division, the Responsible Corporate Officer will be designated by the Chief Executive Officer. If a Facility Manager is not designated for a non-manufacturing facility, such as the corporate office facility, the Safety Coordinator appointed for the facility will work directly with the Responsible Corporate Officer as applicable, necessary and appropriate to implement Gateway. The term “Corporate EH&S” refers to the Corporate Environmental, Health & Safety Department.

I. Management Responsibility and Leadership

A. Leadership and Policy

1. Management responsibility for a healthy and safe workplace cannot be delegated to non-management employees. Management at every level must lead in the implementation and operation of Gateway and must actively solicit and require participation from all employees.
2. Each Facility Manager will have overall responsibility for leadership and oversight of Gateway at the facility. The Facility Manager will appoint a “Safety Coordinator” who will have direct responsibility for Gateway, as well as other duties assigned by the Facility Manager. Health and safety responsibilities will be the highest priority for the Safety Coordinator in the event of conflict with other duties.
3. The Facility Manager shall set an example for the facility by demonstrating interest in and concern for workplace health and safety. The following activities are examples of leadership expected from the Facility Manager:
 - complying with all safety requirements
 - leading Facility safety committee meetings as often as possible
 - participating in discussions or initiating discussions of safety issues whenever suitable during other meetings at the facility
 - taking opportunities to introduce the concept of safety at meetings held for the purpose of focusing on unrelated topics

- personally acknowledging the participation of employees in safety related activities, as appropriate
- evaluating subordinate leaders on the quality of their leadership and commitment to Gateway and making that factor an essential qualification for promotion

4. Each facility will periodically review its performance under Gateway and will establish or revise goals, as appropriate. Any objective identified by the facility as a goal will be specific, measurable, aggressive but attainable, relevant and time bound. Goals may be prioritized as appropriate with the approval of the Facility Manager. The facility's performance under Gateway and its progress toward established goals shall be periodically reviewed by the Facility Manager and reported in writing to the Responsible Corporate Officer and to Corporate EH&S.

B. Facility Processes and Commitment of Resources

Each Facility Manager shall establish processes and assign responsibility for operation of Gateway. When appropriate to the nature of work and level of staffing at the facility, the Facility Manager should, among other things:

- appoint a safety committee
- appoint a safety coordinator
- maintain an obstacle list
- require and monitor shift safety meetings
- establish a Behavioral Based Safety Program
- establish safety metrics
- develop safety related SOPs
- implement the standardized safety training program and monitor results and effectiveness
- develop current process flow diagrams
- establish other safety teams as needed for specific goals and tasks
- identify employees who can be trained to participate in workplace inspection, hazard review, accident investigation and audits

C. Open Line of Communication

Each facility will maintain open channels of communication to encourage employees to communicate with members of management at the facility, with the Corporate Human Resources Department or with Corporate EH&S concerning any matter, question or suggestion relating to workplace safety or Gateway.

D. Facility Safety Committee Membership

The Facility safety committee shall be led by the Facility Manager and the Safety Coordinator. It shall be comprised of employees selected from all departments who have demonstrated leadership or potential for leadership in the workplace, especially in Gateway support and implementation. Persons filling the roles of operations manager, production superintendent, facility HR coordinator and facility workers' compensation coordinator shall also be members of

the Facility safety committee. Other members may be selected by the Facility Manager based on factors specific to the facility.

E. Facility Safety Committee Meetings and Duties

The Facility safety committee shall meet as needed, but not less frequently than once each month during the year. A written meeting summary recording attendees and action items will be kept by the Safety Coordinator. At least quarterly, the Facility safety committee will review the facility's Gateway to evaluate performance and effectiveness and make modifications required to achieve ZISC.

The Facility safety committee shall review:

- all health and safety related incidents, accidents and injuries
- all planned and unplanned changes at the facility which have the potential to create or change workplace hazards

F. Safety Coordinator

The Safety Coordinator must have experience and/or training approved by the Responsible Corporate Officer and Corporate EH&S, and will:

- develop and implement processes to meet OSHA requirements using standardized processes developed by Corporate EH&S
- investigate safety related accidents and incidents and prepare reports for the Facility safety committee
- conduct workplace hazard surveys
- conduct workplace inspections for noncompliance
- verify that every employee receives required training before starting as a new employee and before assuming new responsibilities
- supervise training for visitors and contractors
- ensure that ongoing training for current employees is conducted and its effectiveness is monitored
- execute FAWS exposure monitoring and other industrial hygiene related monitoring programs if applicable at the facility

G. Accountability

1. Management is expected to set an example by complying with all facility health and safety requirements and demonstrating interest in and concern for workplace health and safety. Safety compliance and the quality of participation in safety related assignments will be factors considered in decisions for promotion of all employees to more responsible positions including leadership and supervisory positions.

2. In addition to advancement, other reward programs may be devised and instituted in cooperation with Corporate EH&S to foster support for Gateway.

3. The facility's disciplinary process shall also be used to support the system. The Facility Manager is not restricted to progressive discipline where there is noncompliance with Gateway. An employee whose actions indicate conscious disregard for workplace safety or an inability to work safely is subject to termination. Working safely and complying with safety SOPs is a condition to continuing employment.

II. Employee Participation

A. Open Communication and Complaint Process

1. Each facility will allow open communications concerning Gateway so that employees may present suggestions, ask questions and identify and communicate hazards.

2. Any employee with a complaint about safety may, in addition or as an alternative to telling a supervisor, make the complaint (in oral or written form) to the Safety Coordinator, the facility HR coordinator or the Facility Manager. In addition to options at the individual facility, the employee may (as an equally acceptable option) communicate directly with the Chief Compliance Officer, Corporate Human Resources or the Legal Department. Each written complaint received from an employee will require a response from, or be approved by, the Facility Manager.

Each facility will report regularly to the Responsible Corporate Officer regarding complaints from employees and their disposition. A record of each employee complaint, the response and the disposition of any issues raised will be delivered to the Chief Compliance Officer and will be kept available at the facility for inspection until the end of the year following the year in which the complaint is received from the employee.

B. No Retaliation

There shall be no retaliation against an employee for good faith participation in the communication or complaint process with respect to Gateway and related issues. Employees will be trained to understand the duty to report noncompliance or possible noncompliance with Gateway and/or applicable safety laws.

C. Behavioral Based Safety Program

Each manufacturing Facility Manager will select an employee team for implementation and operation of the Behavior Based Safety (BBS) Program. Using a standardized tool kit developed by Corporate EH&S, the Safety Coordinator or BBS steering team shall train every team member in the BBS process. All employees will be required to allow BBS observers to observe them while working.

D. Obtaining Input

1. Employees will be selected for membership on the safety committees, as well as on teams formed to conduct departmental and facility inspections to study hazards and to identify and evaluate effective controls. To the extent it is practical to do so, employees should be selected to participate on teams that review workplaces and plants other than their own.
2. During baseline and ongoing hazard surveys under the hazard identification portion of Gateway, the process shall include interviewing employees selected for experience in the areas being surveyed.
3. Individual participation by employees in safety activities, whether observations, committees, inspection teams, etc., shall be a factor considered in promotion decisions at the facility.
4. Neither the training of employees for participation in inspections for safety hazards and compliance with Gateway nor their performance of such inspections will shift the primary responsibility for compliance from the facility leadership.

III. Hazard Identification

A. General Obligation

Hazard identification shall be a continuous process. Employee observation data, information from employees involved in incidents and employee communications will be reviewed by the safety committee for indications of unidentified hazards. Where applicable, the Facility safety committee will also review exposure test results (from the FAWS program or other exposure testing) and trend analysis data for unidentified hazards.

B. Workplace Hazard Survey

1. Using the standardized tool kit developed by Corporate EH&S, each facility shall conduct a baseline survey to identify hazards to employee health and safety in the workplace. The primary components of the survey will be FAWS sampling results, workplace analysis and incident analysis.
2. The workplace analysis shall include an inspection of the workplace by a team led by the Facility Manager or the Safety Coordinator. The team will include a member of Corporate EH&S and an employee from another facility, in addition to other employees in the facility designated by the Facility Manager.
3. The survey shall include interviews with facility employees. Team members will use the checklist provided in the standardized tool kit to ensure coverage of the following subjects during interviews:
 - Whether the employee is aware of specific health or safety problems common to a particular group of employees or any specific area of the facility
 - Whether the employee is aware of uncontrolled safety hazards
 - Whether the employee has witnessed near misses

- Whether the employee has any specific concerns or suggestions about hazards
4. If needed for analysis of specific jobs, the survey will include job hazard assessments or ergonomic studies using expertise provided by the facility and/or Corporate EH&S.
 5. The survey shall identify and review both routine and non-routine activities, considering regular production and maintenance, as well as known or possible breakdowns and upsets. Activities of contractors and other visitors to the facility shall also be included in the survey.
 6. Every workplace activity must be examined for the potential to create or intersect with a workplace hazard.

C. Incident Analysis

Safety incidents in the workplace shall be analyzed by reference to the databases for incident reports. In addition, if needed, interviews with employees involved in or who witnessed safety related incidents should be conducted. Incidents should be reviewed for patterns, trends, locations and types of injuries and the findings should be studied for hazards that have not been identified or adequately controlled.

D. Hazard Inventory

1. Using the analysis of the workplace and incidents as a starting point, each facility will document its hazard identification survey by creating and maintaining a written inventory of identified workplace hazards. Identified hazards will remain on the inventory until eliminated. Removal of a hazard from the inventory will require the recommendations of the Facility Manager and concurrence by the Responsible Corporate Officer and the Corporate Director of EH&S. For hazards which cannot be eliminated and require control, the inventory shall include a description of the control(s) implemented for protection against the hazard.
2. A current copy of the facility's hazard inventory shall be maintained for inspection and shall be accessible to the Responsible Corporate Officer and Corporate EH&S.

E. Keeping Hazard Inventory Current

Maintenance of the facility's hazard inventory will be an ongoing process. Not less frequently than at two-year intervals each facility shall conduct a workplace analysis to update the hazard inventory and shall report the completion of the update and findings to the Responsible Corporate Officer and Corporate EH&S.

F. Analysis of Changes

1. Each facility shall develop a process for the analysis and management of planned and unplanned changes in the following areas:

- Regulations

- Capital improvements, building and equipment modifications
- Products
- Raw materials and supplies
- New or restructured job duties
- Transportation
- Vendors
- Health studies
- Technological enhancements

2. The results of every change analysis will be documented in writing and reviewed by the Facility Safety Committee with modifications made as necessary to the hazard inventory and hazard controls.

IV. Program for Controlling Hazards and Maintaining a Safe Working Environment

A. Methods of Control

1. Each facility's safety policy will be designed and managed to ensure that identified hazards are effectively controlled and that accidents, incidents and noncompliance receive prompt and appropriate responses.

2. Using the hazard inventory as its initial target list, each facility shall eliminate or control workplace hazards with the preferred method of hazard control being elimination of the hazard. The Facility Manager shall cause workplace layouts, processes, machinery, operating procedures, staffing and organization to be designed to avoid creation of hazards in the first instance whenever practicable. The design shall include a statement identifying each hazard foreseen in the design with a corresponding recommendation for control.

3. Where guarding or barriers are part of the engineered controls, lockouts should be engineered against individual bypass of such barriers where required and where practicable.

4. When engineering controls will not adequately control a hazard, work practices shall be established to prevent contact with the hazard where practicable. Work practices, where implemented, shall be recorded as part of the facility's policy. *As a last resort or as supplemental protection*, where appropriate, personal protective equipment and administrative controls may be used to control hazards. All controls implemented must be documented with the relevant hazard on the facility's hazard inventory. All controls implemented are subject to approval by the Responsible Corporate Officer and Corporate EH&S.

B. Maintenance of Controls

1. Facility management will give constant attention to the maintenance of hazard controls. Where engineering controls are used, a preventive maintenance schedule shall be designed, written and approved by the Facility Manager to provide maintenance that will keep engineering controls functioning as intended. Maintenance items shall be entered in the facility's Safety Action

Assistant to ensure that employees responsible for maintenance and employees responsible for oversight receive on-time reminders of action items.

2. Regular training and retraining shall be conducted to help ensure employees properly follow work practices and comply with personal protective equipment rules and administrative controls.

3. Every employee has the right, at any time, to raise questions or make suggestions regarding the effectiveness of a hazard control.

4. Not less frequently than hazard surveys are conducted at the facility, the facility shall also review the appropriateness and effectiveness of existing control methods for the entire hazard inventory. Completion of the review and findings shall be reported to the Responsible Corporate Officer and Corporate EH&S.

C. Contractor Safety

Facility safety procedures shall include a written safety program for outside contractors that has been approved by the Responsible Corporate Officer and Corporate EH&S. The program will include a process to protect contractor employees from the hazards of workplace operations and will protect employees and others in the workplace from hazards created by the contractor's activities. The procedures will require that the contractor's own safety policy conforms to the requirements of the facility's safety policies.

D. Visitor Safety

Facility safety procedures will include a written program for protection of visitors including representatives of vendors and others who are admitted to the premises. The program will provide for orientation of visitors with respect to hazards to which they may be exposed and safely avoiding such hazards. The program will also orient visitors as to emergency evacuation procedures for the facility.

E. Emergency Response Planning

1. Each facility responsible for maintaining an EPCRA emergency response plan shall keep it updated. Facility safety procedures may, if needed, include policies supplemental to the emergency response plan to enhance the protection of employees from hazards associated with responding to emergencies and/or evacuation of the facility.

2. Evacuation drills shall be conducted at each facility. Where practicable the Facility Manager may conduct drills limited to specific areas or departments where there is a need for additional or more frequent practice. An assessment of each drill will be made and deficiencies will be discussed by the Facility Safety Committee.

F. Medical Treatment

1. Methods for obtaining emergency and acute care shall be documented and available to all personnel. Emergency response teams will be designated and trained to respond to workplace injuries and illnesses. Physicians on call to treat injuries shall be provided with information on health and safety hazards identified at the facility. Every effort will be made to provide such physicians with a tour of the facility to familiarize them with workplace hazards.
2. Written rules for responding to and reporting of injuries and illnesses in the workplace shall be a part of the facility procedures. Each facility shall promptly report all workplace injuries and illnesses. In no event shall injuries or illnesses remain unreported for more than three days.
3. Return to work following injury or illness will be managed on a case by case basis, subject always to physician approval. Return to work with less than a full medical release shall be considered and managed on an individual basis considering the employee's condition and work available at the facility. No return to work on less than a full release may be authorized unless the Facility Manager is satisfied that the employee's supervisors and line leaders understand clearly every work restriction imposed by the physician, and the Facility Manager determines that the employee can be protected from deviation from such restrictions.

G. Accident Investigation

1. The facility's safety procedures will include a written process subject to the approval of the Responsible Corporate Officer and Corporate EH&S to respond to and manage all accidents, incidents and noncompliance. Each accident, incident and noncompliance shall be investigated. If the investigation determines corrective or preventive actions may be appropriate, they will be considered, developed and implemented. The facility's hazard inventory and/or its hazard controls shall be added to or modified as appropriate.
2. No corrective or preventive action (except as necessary on an interim basis) shall be undertaken until the action and its implementation have been assessed for risk. Corporate EH&S will assist with reviews of corrective and preventive actions to evaluate their effect on workplace safety. Such reviews shall be documented.
3. A written report of each investigation, its findings and actions taken will be provided to the Responsible Corporate Officer and Corporate EH&S. A written follow up report will be provided following any subsequent evaluation of corrective or preventive measures which may be undertaken.

V. Education and Training

A. Training Programs

1. Corporate EH&S shall develop a standardized tool for use by each facility to develop training programs to support Gateway.

Training shall:

- orient new employees
- orient existing employees assuming new job duties
- orient visitors, including representatives of vendors and service providers on the premises
- orient contractors working on the premises
- refresh and enhance the knowledge of existing employees

2. Training programs shall include, whenever practicable, processes for sharing the knowledge of more experienced employees that have demonstrated support for Gateway so that new employees and employees assuming new job duties can benefit from that experience.

3. A component of training on all subject matter covered under Gateway will be education on the consequences of noncompliance.

- Trainees shall be taught how noncompliance can result in risk to the health and safety of themselves and/or others (as applicable).
- Trainees shall be taught the administrative consequences of noncompliance, including discipline that will be imposed on employees and other consequences (such as being barred from the facility in the case of visitors or contractors).

B. Training Subjects

Subject matter of training shall be designed to meet applicable legal requirements and to cover all hazards to which the trainee will be exposed. The following list of subject matter should be considered for applicability although it is not intended to be exclusive and does not limit the freedom of the Facility Manager or Corporate EH&S to create new subject matter for a hazard unique to the facility.

- emergency evacuation procedures
- fire protection
- first aid
- CPR
- bloodborne pathogens
- hazard communications
 - ☐ including formaldehyde exposure
 - ☐ including asphalt fumes exposure
 - ☐ including wood dust exposure
 - ☐ including silica exposure
- confined space procedures
- lockout/tagout procedures
- production hazards
- LP gas
- forklift safety
- fall protection including ladders and scaffolds
- electrical safety
- welding and cutting

- radiation safety
- personal protective equipment including respiratory protection
- environmental protection
- ergonomics
- Department of Transportation training
- accident reporting process
- accident/incident review and investigation
- workplace hazard inspection

All training and designation of employees to be trained are subject to approval of the facility manager.

C. Keeping Training Current

Corporate EH&S will develop a process for regular research of health and safety subject matter to ensure knowledge base and training materials are up to date and consistent with applicable legal requirements, gains in clinical and technical knowledge and advances in health and safety practices. Concurrent with the process for ongoing research, Corporate EH&S will assist each facility to review training quality and to evaluate effectiveness.

The review will include monitoring of multimedia training programs, attendance at live classes and interviews with employees. Interviews shall include questioning employees to gauge understanding of the subject matter, including essential elements of work practices, personal protective equipment, the hazard reporting process, and whether employees find training interesting and understandable. Written reports of training evaluations at a facility will be furnished to the Facility Manager, the Responsible Corporate Officer and Corporate EH&S.

D. Records

Each facility will maintain a database of training subject matter and attendees. Each facility will report to the Responsible Corporate Officer and Corporate EH&S not less frequently than annually regarding compliance with the training program for new employees, and current employees, and shall specifically identify all problems encountered in meeting training objectives.

VI. Evaluation and Continuous Improvement

A. Leadership

The Responsible Corporate Officer and Corporate EH&S shall be responsible for development and implementation of processes to evaluate the effectiveness of Gateway at manufacturing facilities. Evaluation processes for other facilities will be the responsibility of Corporate EH&S. Principles of continuous improvement shall be applied to the operation of Gateway as they are applied to manufacturing processes.

B. Broad Scope Reviews

1. Evaluations will include reviews of facilities conducted by management and employees of the facility with or without assistance from a member of Corporate EH&S. In addition, Corporate EH&S will form teams to conduct audits of individual facilities for implementation of and compliance with Gateway. Such audits may be designed to focus on any or all aspects of facility health and safety programs. Audit teams may be led by Corporate EH&S or by outside firms chosen for their audit expertise. Teams shall include employees and supervisors from the facility being audited. Teams may also include employees from other facilities.

2. Reviews and audits will (consistent with the subject matter or areas targeted by the review or audit) include interviews with employees regarding, among other things:

- knowledge and opinions about the effectiveness of Gateway
- knowledge of facility's safety goals
- opinions of effectiveness of facility leadership toward goals and compliance with Gateway
- understanding of subject matter of training
- knowledge of duty to report injury, illness, hazards and near misses
- knowledge of processes available for individuals to raise safety related concerns or complaints

C. Evaluation

Using the principles of continuous improvement, data shall be collected on an ongoing basis by each facility and by Corporate EH&S and used for the purposes of:

- evaluating effectiveness of Gateway
- evaluating effectiveness of training
- evaluating effectiveness of hazard controls
- hazard identification
- improvement of Gateway

D. Records

Corporate EH&S shall review the corporate record retention policy for applicability to corporate and facility records relating to Gateway operation and will assist facilities in modifying the record retention schedule, as appropriate, to manage all records created as a result of Gateway, including:

- OSHA required records
- exposure testing results
- documentation of execution items under Gateway

E. Data Collection

The following list of subject matter for data collection is intended to be a starting point. Objectives in data collection will include obtaining the data most useful for managing Gateway. Continuous improvement principles shall be applied to determine the data to be collected and the measurements to be used.

- BBS concerns observed, by number and type
- near misses
- incidents
- injuries
- injury severity
- injury rate
- lost time injuries
- days of work lost
- days of work under restriction
- OSHA recordable incidents and accidents
- workers' compensation claims
- safety related discipline
- exposure monitoring
- accident investigation data
- frequency of use of lockout/tagout process
- number of confined space entry permits issued
- number of hot work permits issued