



Spray Foam Coalition Code of Conduct

Members of the American Chemistry Council (“ACC”) Center for the Polyurethanes Industry’s (“CPI”) Spray Foam Coalition (“SFC”) are the leading manufacturers of spray polyurethane foam (“SPF”) systems sold or distributed in the United States. The values of product stewardship and product safety are important to the entire SPF value chain. SFC members that manufacture SPF systems promote worker and public health and safety with respect to their products, which include the chemicals that react to make SPF and the final SPF materials.

The SFC Code of Conduct provides a framework to drive continuous improvement in health and safety and product stewardship. Agreement and adherence to this code of conduct is a requirement for membership in the Spray Foam Coalition for companies that manufacture SPF systems (“systems house members” or “members”).¹ This Code of Conduct will be reviewed regularly, at least annually, and revised as needed by the SFC membership. There is also a governance process.

This Code of Conduct begins with a commitment to a culture of product safety by the members that manufacture SPF systems. Each systems house member will adhere to the six commitments set forth in this Code of Conduct. Suggested practices are only examples of possible ways to adhere to the Code of Conduct’s commitments, but should not be considered the sole or recommended means to do so, nor do they replace each systems house members’ legal obligations under federal, state and local laws and regulations. Other practices may also be used because a suggested practice may not be widely applicable to all systems houses, and may be substituted or adapted to meet specific needs and varying factual circumstances.

1. Leadership Commitment.

Senior company leadership of the SPF business group demonstrates a culture of product safety and product stewardship through their words, policies and actions throughout their company and in external communications.

Suggested practices might include, but are not limited to the following:

- Developing policies, activities, and resources throughout the company to encourage active participation and communication concerning product safety and product stewardship.
- Senior leadership of the SPF business group designating an individual to monitor the company’s adherence to the six commitments of the SFC Code of Conduct.
- Conducting an annual internal review of the company’s adherence to the six commitments of the SFC Code of Conduct and reviewing performance with senior leadership of the SPF business group.

¹ Not all members of the SFC are systems houses. This Code of Conduct only applies to systems house members of the SFC.

2. Commitment to Hazard Communication.

Hazard communication is the foundation of safe use and handling of SPF chemicals.

Suggested practices might include, but are not limited to the following:

- Making required Safety Data Sheets (“SDS”) for products readily available.
- Providing customers with appropriate health and safety information specific to each product formulation.
- Advising customers about the use of Personal Protective Equipment (“PPE”) for each type of application and each stage of the work.

3. Commitment to Applicator Training.

SPF is applied onsite, which means that professional SPF contractors and their applicators are a key factor in the safe production and application of the final product. Systems House Members support the safe application of SPF and provide customers with information about safe handling practices for their specific products.

Suggested practices might include, but are not limited to the following:

- Encouraging customers to successfully complete the applicable CPI free online basic chemical health and safety training at www.spraypolyurethane.org. Completion of this program can be verified by requesting the Record of Completion.
- Supporting and encouraging professional SPF contractors to seek professional certification, like that available through outside organizations, trade associations and professional groups.
- Providing technical service support to customers to address their technical questions.

4. Commitment to Continuous Improvement.

To support the safe use and handling of SPF, systems house members work with customers to address concerns related to the product and are committed to continually improving processes. Senior leadership of the SPF business group supports processes to receive, evaluate, and communicate product safety and stewardship information about SPF and requests from value chain participants.

Suggested practices might include, but are not limited to the following:

- Establishing regular communication with customers and suppliers to provide and receive feedback on SPF product safety and product stewardship.
- Having a consistent process in place for handling customer inquiries that outlines how inquiries are investigated and resolved in order to promote continuous improvement.
- Making technical data sheet information on the company’s products publicly available.

5. Commitment to Education and Research.

Senior leadership of the SPF business group supports education and research about SPF products and processes to continually enhance their company's understanding of the material components of their products and the science of their application and use. Systems house members keep current on safety and health developments in the SPF industry.

Suggested practices might include, but are not limited to the following:

- Participating in a process individually, through trade association collaboration, or other programs to improve the understanding of the material components of SPF products and the science of their application and use. For example, conducting research and education about SPF either as an organization, trade association member, or through another program.
- Actively participating in CPI Spray Foam Coalition's activities.
- Publicly committing to this Code of Conduct.
- Encouraging innovation through research in building sciences, new products and technologies.

6. Commitment to Report Publicly about Commitment to the Code of Conduct.

The systems house members commit to communicate their commitment to the SPF Code of Conduct.

Suggested practices might include, but are not limited to the following:

- Participation in the SPF Code of Conduct program is reported on the systems house member company's and Spray Foam Coalition's websites.

Legal Notice and Disclaimer:

This Code is not intended to create constraints of any kind on the Spray Foam Coalition Systems House Members' ("members") commercial decisions regarding competitively-sensitive topics including, but not limited to, price, discounts, or sales volume. This Code is also not intended to alter the member's responsibility for its own safety practices and decisions. Thus, it is not a substitute for an individual member's requirements, nor is it designed or intended to define or create legal rights or obligations. Each member has an independent obligation to ascertain that their actions are in compliance with their current country, federal, state and local laws and regulations and should consult with legal counsel concerning such matters. The Code is necessarily general in nature and members may vary their approach with respect to particular practices based on specific factual circumstances, the practicality and effectiveness of particular actions and economic and technological feasibility. The suggested practices are intended solely to stimulate thinking and provide helpful ideas on code implementation. They are in no way meant to establish a standard, legal obligation or preferred option for any practice. Other approaches not described here may be just as effective or even more effective for a particular company. A member may find that one or more of these examples provide a useful approach that will further its implementation efforts. If a member so chooses, it may adopt any of these examples or may modify them to fit their unique situation. It is anticipated that members will vary in their approaches as they implement the SPF Code of Conduct, and that a "one-size-fits-

all” methodology is neither appropriate nor workable. In adhering to this Code of Conduct, each member is encouraged to establish its own practices based on specific factual circumstances at its facilities, the practicability and effectiveness of particular actions for an individual company, and economic and technological feasibility.

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