



INCIDENT MANAGEMENT PLAN (IMP)

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OVERVIEW

Purpose

This Incident Management Plan (IMP) is designed to ensure that there is a clear, practical system and guiding tools for communicating and responding to significant incidents that may arise anywhere within the Armstrong World Industries (AWI) global network. Whether at the enterprise level or at any operating facility, this plan provides guidelines that are intended for use by AWI personnel responsible for assessing and responding to any incident that may require communications to our employees, our communities, customers, business partners, media, investors or the general public. This IMP is designed to ensure that AWI is able, if appropriate, to respond quickly, consistently and in keeping with its core values.

Although it is impossible to outline every possible applicable scenario, this IMP provides incident management and communication guidelines based on four potential scenarios listed in the appendices: environmental issue, operational disruption, product failure, ethics / governance breach. This IMP is designed and intended to align with AWI's business continuity plan. Similarly, this IMP is intended to complement any existing Emergency Response Plan (ERP) prepared by our manufacturing facilities when the need arises.

Definition of an Incident

An incident, for the purpose of this IMP, is any event or issue that has the real potential for any one or combination of the following outcomes:

- Significant harm to customers, employees, shareholders, the local community or the company's brand or reputation
- Adverse media attention or becoming a negative media hallmark
- Negative industry or company news in mass circulation
- Business interruption with significant financial consequence

In addition, any (a) significant incident that is managed in the context of the company's business continuity plan or any facility's ERP, or (b) unplanned or involuntary incident with the potential to consume a significant amount of time and attention from senior management or that demands a material amount of company resources, should be carefully evaluated for management under the IMP. Importantly, however, not all incidents that fall within the scope of the AWI business continuity plan or any ERP will require the activation of the IMP.

What is Reputation?

In the course of managing our response to any incident, we will be protecting both people and property. Importantly, as stewards of the AWI legacy, we will also be guarding our reputation. Our reputation is comprised essentially of three elements: our character, our identity and our image.

- ***Our character is what AWI is...*** This includes the character and culture of the company as defined by our operating principles.
- ***Our identity is what AWI says it is...*** Our company's identity is comprised of how we want to be perceived and understood by internal and external stakeholders. A corporate identity is actively supported by proactive and reactive communications and marketing activities.
- ***Our image is the sum of what stakeholders think AWI is...*** This is the perception that employees and other key stakeholders have of our company. It is the trust and confidence that they display through their employment, patronage, referral and continued productive support.

Guiding Principles

- **Respond early**
An early response is the best way to contain an issue or minimize the problems created by an unforeseen incident, whether it has the capacity to disrupt operations or not.
- **Speak with one voice**
In responding to an issue, it is critically important that we talk to the media, our employees, customers, consumers or other stakeholders with “one voice.” Our message must be consistent. For this reason, and to the best of our ability, AWI will centralize our media response and centrally coordinate other internal and external communication on major issues.
- **Comply with the laws and regulations applicable to the situation**
In responding to any incident, AWI and its agents will comply with all applicable laws and regulations, and cooperate as required with any law enforcement and regulatory agencies.
- **Only authorized employees shall communicate with the media**
In accordance with the **AWI Policy GP-10.B, Media, Endorsements and External Communications**, only authorized, designated employees are to communicate with the media on behalf of AWI. All other personnel are to direct any inquiries to the appropriate designated spokesperson or manager.
- **Response is measured and appropriate**
In responding to incidents or threats to the company’s reputation, it is important that we not over-react or under-react to any incident or threat. All responses will be proportional to the events that prompt them. We do not want to mistake a bad day for a serious incident, or vice versa.
- **Prioritize and delegate**
Managing an issue often means tackling a number of complex tasks in a short time. Using the procedures prescribed by this plan allows us to call on the appropriate internal and external resources for help.

IMP Implementation and Maintenance

This IMP was created through a collaboration of AWI senior management and the application of best practices drawn from leading companies. AWI has committed to regularly update the IMP and to maintain the skill level of senior leaders to activate it and fulfill their designated roles and responsibilities as described in the plan. The maintenance of the plan – including periodic updates as well as determining and providing any needed training of leaders needed to activate it – will be the responsibility of the General Counsel of AWI, with input from the AWI senior management team.

The IMT Core Team will meet at least once a year to review and recommend updates to the IMP and conduct an annual test.

THE INCIDENT MANAGEMENT TEAM

IMT Charter

Once the IMP is activated, incidents will be managed under the direction of a dedicated Incident Management Team (IMT).

The IMT is principally charged with providing a response that preserves the health and safety of AWI employees, customers and the larger community as well as a response that preserves the reputation of the company. Therefore, it is crucial that IMT members are empowered with the authority to:

- Convene senior executives
- Arrange the support needed, and
- Authorize resources (both funds and people) as necessary to properly deal with any potential situation

IMT Structure and Interaction

The AWI IMT has a two-tier structure, comprised of a **Core Team** and an **Extended Team**. The Core Team should include one representative from Corporate Communications, Human Resources, Legal and Operations, plus a team-designated team leader and project manager. In the event of an incident, the Core Team may meet frequently and steer the critical decision making process for AWI, while the Extended Team gathers information to properly augment and inform the Core Team's decision management process. The Extended Team will be activated in part or in whole at the discretion of the IMT leader.

Both the Core Team and the Extended Team may convene sub-teams as appropriate, engaging the appropriate individuals to gather the needed information and relevant expertise.

IMT Roles and Responsibilities – Core Team

- **The IMT Team Leader**
The IMT team leader will be identified within the Core Team based on the type of incident. She/he will manage the Core Team, assess the circumstances and risk; apply the necessary resources and strategy to address the incident and direct the IMT in managing through the response. The IMT leader will assure that management decisions are implemented in an appropriate and timely manner to achieve the objective that the team has set forth. She/he may provide regular and timely updates to both senior management and the board as circumstances dictate. The IMT leader may be required to represent the company in a unified command structure as required by federal and state/government officials.
- **Project Manager**
The project manager has the responsibility of planning and executing the IMP, working closely with the team leader and the functional representatives on the IMT. The project manager does not represent a particular function, but rather acts as a point of integration between IMT members.
- **Operations**
The operations representative will advise the IMT on all matters related to continued business operations, e.g., logistics, movement of goods, transportation, customer service needs. She/he will be sufficiently well versed in all aspects of company operations to advise the team and obtain the necessary support from the organization (including sales, plant leadership, vendors and customers).

- **Human Resources**

The human resources leader will advise the IMT on all matters related to AWI employees. She/he will make the appropriate employee information available to the team as required and support the team in communicating with and ensuring the safety of employees as circumstance may require.

- **Legal and Compliance**

The legal representative on the Core Team will provide the team the appropriate legal counsel and retain or engage outside counsel as circumstances may require. She/he will also advise the IMT on issues relating to regulatory compliance and may coordinate with local, state and other governmental agencies to ensure that any compliance obligations required to affect a response will be at the team's disposal. She/he may also coordinate with regulatory agencies who are interested in the circumstances related to the incident and the response.

- **Communication and Government Relations**

The communication and government relations representative is responsible for leading any communications related to the incident response and for coordinating with government officials who may be interested in the incident or response (other than regulatory officials who are immediately engaged in the response). She/he is responsible for internal and external communication, supporting direct and indirect communication with employees, the surrounding community, customers, the supply chain, vendors, partners and investors. The communication and government relations representative may act as the spokesperson with media as required or will identify and prepare the most appropriate spokespeople. She/he is responsible for gathering an external view of the incident and keeping the IMT informed on the outside reaction to the incident and response.

IMT Roles and Responsibilities – Extended Team

- **Operations**

The operations representative will be identified and enlisted to support the response as required by the IMT leader and the Core Team. He/she will be versed in operations to advise the team and obtain the necessary support from the organization (including sales, plant leadership, vendors and customers). The operations representative will also be responsible for the logistics and movement of goods as circumstances may require.

- **Finance/risk/investor relations**

The finance/risk/investor relations representative is responsible for advising the team on matters related to the expenditure of financial resources to support the response. He/she is responsible for providing the team with an appropriate understanding of issues related to insurance coverage and he will coordinate with the communication representative in making a required or appropriate notifications of investors or financial analysts.

- **Regional VP/executive**

The IMT leader will draw support from the appropriate regional executive as required to provide market insights or other local market advice that the team may require to manage an appropriate response to the incident.

- **Environment, Health & Safety (EH&S)**

The EH&S representative will be enlisted by the IMT to support any aspects of the response that are related to the health and safety of people and property that may be effected by the incident or the response. He/she may also be recruited to support the compliance representative or the IMT leader to coordinate with emergency response teams that may be responding to the incident.

- **Facilities/security**

A facilities and security representative may be engaged to support the team's physical needs in the course of the response. This could include providing for site security, telecommunication assets or other requirements to maintain an effective response.

- **IT**

Members of AWI's IT team may be consulted to provide support for accessing physical and virtual data and/or access to other systems.

- **Logistics**

An AWI logistics representative may be called upon to provide information and answer questions about movement of materials and customer service issues.

- **Sales**

A member of the sales team may be engaged to provide information and guidance on addressing customer relations concerns.

- **eMarketing**

A member of the eMarketing team will be consulted to support social media monitoring efforts as needed.

- **Ad hoc:** local counsel, subject matter experts, outside consultants as required.

THREAT AND INCIDENT RESPONSE PROCEDURES

Guidelines for Assessing the Severity of an Incident

Whenever an operating facility experiences a situation that may require activation of their ERP or some other significant incident with the potential for adverse results, the senior management of that facility will notify the appropriate operating vice president. That operating executive will make a determination of whether to notify the IMP Core Team, in part basing the decision on an initial assessment of the severity of the situation. This assessment will include such questions as:

- Can the issue be handled locally?
- Does the situation have the potential to have a larger impact, beyond just a local one?
- Can it cause harm to employees, customers, the community or the company's share price?
- Can this disrupt our business in whole or in part?
- Is there a potential for adverse media attention?
- Who else needs to know?

If an incident demands significant attention and may reasonably be expected to have a material adverse impact on the company, disrupt normal business operations or attract significant media attention, it may warrant activation of the IMT via contact with the Core Team as described on the next page. Triggers for the IMT may include:

- Significant potential for harm to customers, employees, the community or the company's reputation or share price
- Likely to result in adverse media attention
- Negative industry / company news, in mass circulation
- Potential for business interruption with significant financial consequence
- Issue has the potential to become a negative media hallmark

Refer to the Decision Trees in the appendices for a graphical depiction of the assessment and escalation process.

Notification and IMP Activation

The first decision that the organization has to make is whether and how to activate the IMP. Prior to making that decision, the Core Team and senior leadership need to receive appropriate notification of circumstances that may exist so that an appropriate activation decision can be taken. Activation of an ERP at one of our operating facilities may likely trigger notification. Other circumstances may arise that necessitate a simple and efficient notification process so that the correct and timely decision with respect to activating the IMP will be taken.

Whenever an operating facility experiences a situation that requires activation of their ERP, the senior management of that facility will notify the appropriate operating vice president. That operating executive will make a determination of whether to notify the IMP Core Team. If that notification needs to happen, it will happen via both email and direct telephone contact.

An email should be sent to IMTcore@armstrongceilings.com. That email should follow a simple construct as described below. The same notification should be sent whenever AWI leaders believe that circumstances exist that may develop to meet the definition of an incident as described above.

Importantly, the notification process is a two-step process: Step One is the initial email to the Core Team alias and Step Two is the follow-on telephone call with at least one member of the Core Team.

Step One – The email notification

The initial email should be necessarily brief. It is not necessary to provide the Core Team with the details of the circumstance, but rather, just that a situation exists that has either necessitated the activation of the local ERP or which may evolve to meet the definition of an incident as described above.

The email should be constructed to read something like the following example:

I wanted to let you know that we have just activated the [location] ERP. We have experienced an [operating event] that may require your involvement. I would like to speak to one of you by phone at your earliest availability. You may contact me directly at [phone number].

That initial email should not contain any details of the circumstances that led to the activation of the ERP but just the fact that circumstances have arisen that required its activation.

There may be situations that do not require activation of the local ERP but which might reasonably evolve to become an incident that requires the attention of the IMT. In those cases, the responsible AWI leader will send a similar email to the Core Team as the initial step in the notification process. That email should read something like the following example:

I wanted to let you know that we are seeing a situation here in [location] that may require your involvement. I would like to speak to one of you by phone at your earliest availability. You may contact me directly at [phone number].

Again, no specific details of the circumstances, just the fact that circumstances may exist that might require the attention of the IMT.

Step Two – The follow-up phone call

At least one member of the Core Team will ‘Reply All’ to the initial email noting that he or she will make the call to the sender. That phone call is where the details can be shared and where the Core Team member can ask some more probing questions to determine whether additional support or activation of the IMT is appropriate.

Following that initial conversation, the Core Team member who took the call will convene the Core Team for a briefing or let the other Core Team members know that more information is being gathered before the Core Team should convene either in person or by phone as the circumstances warrant.

Response Process

1. Incident Management Team (Core Team) determines need for a meeting

The IMT Core Team has an initial discussion to determine whether it needs to meet immediately or whether members should work independently to gather additional information.

In assessing the situation, the team will consider:

- Should the Core Team meet immediately?
- Should the team meet in the next few days?
- Can the problem be handled by one department, eliminating the need for the Core Team to meet?
- Who else needs to know about this situation (internal and external parties)?

2. State the problem

If the Core Team meets, its first priority is to understand the full scope of the problem as best as possible. From there, the team should be able to determine whether it should continue solving the problem together or direct it to an individual or department.

3. Identify a team leader and project manager

Based on the scope of the incident, the Core Team should elect a Team Leader and Project Manager. The Team Leader should contact the Project Manager.

4. Notify senior executives and/or the AWI Board of Directors

If the team meets, the Team Leader shall alert the appropriate executives and, with the prior approval of the AWI CEO and General Counsel, the Board of Directors, as appropriate.

5. Identify information gaps and gather information

In stating the problem, the team will most likely identify the need for further information or a clarification of certain facts. Fact gathering tasks may be assigned to different members of the team, including the Extended Team, and coordinated by the Team Leader.

In gathering information, answer the “who, what, when, where, why, and how” questions.

6. Verify key facts

Before proceeding or taking action, it’s important that key facts are verified, especially when dealing with injuries or deaths. Cross-reference data with appropriate government agencies, documents and whatever resources are available.

7. Assess media interest

Because the media works quickly and can have a significant effect on reputation, the IMT, at the direction and leadership of the communication representative, should assess the likelihood of media interest as soon as possible.

If media calls are expected, a holding statement should be prepared and its release and distribution planned. At this point in the process, the holding statement may be as simple as:

"We're aware of the situation and we're looking into the matter. We will get back to you when we have more information."

In any event, legal counsel should review the statement and provide advice on legal implications.

The designated communication representative may serve as the spokesperson. If he/she is unavailable, an alternate spokesperson should be identified by the Team Leader. Additional spokespersons should be assigned as appropriate and all spokespersons should be adequately trained.

The communications representative should also initiate monitoring of the wire services, major media outlets, online and social media for resulting coverage as appropriate.

8. Develop position

Based on the foregoing assessment and information gathering, and with as much analysis as time allows, AWI should develop a position on the situation as soon as possible. A position briefly describes where AWI stands and, if change is required, what the company is going to do and why. The Team Leader is responsible for developing the position based on the counsel of other team members. The position should be formulated by using AWI mission, corporate philosophy, values and policies.

9. Take action based on Company position

Once an initial position is developed, the Core Team may have to take various actions to implement the company's position. If nothing else, it will most likely have to communicate its position to various audiences such as employees, customers, media, and government authorities.

10. Assign tasks to various departments

At this point, it may be best for the Team Leader to assign tasks and deadlines to various individuals and departments. While all the tasks cannot be identified ahead of time, there are several functions that are likely to be required.

11. Review position and determine next steps

It is important that the Core Team regularly reviews AWI's position, the effects of its actions and determine next steps, as well as the timeline and actions to date. Standard question should include:

- What's the latest media coverage saying? Do we have to update the press about our actions?
- Have key audiences, such as management, affiliates, employees and government agencies, received our communications and do they understand them?
- What do we know at this point (facts) to confirm the situation? What new questions do we have?

- What information do we have that indicates actions we are taking are fixing the problem, or what information do we have that indicates it is getting worse?
- Do we need additional resources?
- What are customers, employees, government agencies and business partners thinking / doing?

12. Follow-up

Once the initial crisis situation stabilizes, it's crucial that the Team Leader monitors the situation to ensure that it does not worsen and the company follows-up on its word.

There may be immediate steps to deal with the aftermath of the crisis, such as providing a final debrief to all employees, providing a final debrief to the board and other appropriate stakeholders regarding financial impact, changing procedures as appropriate, advertising as an expression of appreciation, etc. The IMT project manager and legal team representative should also ensure company record retention policies are followed and make any regulatory / legal filings as appropriate. Follow-up steps may include:

- Review and follow AWI record retention policies
- Complete any required regulatory or legal filings resulting from the incident
- Prepare the final permanent record of events
- Ensure the Board of Directors, employees and other internal stakeholders have been debriefed on the resolution of the incident, as appropriate
- Ensure external stakeholders have received information on the resolution of the incident as appropriate

13. Critique

After the crisis is over, team members should meet to critique the process and adjust procedures, policies, and the IMP, as necessary.

COMMUNICATION ACTION STEPS

Information Gathering and Incident Chronology

What is the situation?

- What are the exact events that took place? What information do we have that confirms the events? What information do we have that indicates they may NOT have occurred, at all, or as reported? What questions remain open at this point?
 - Whom do we need to interview to get the facts or understand stakeholder opinions?
- When and where did they occur?
- Why did they happen?
- Was the facility or its personnel at fault?

Was a company facility involved?

- What kind of facility?
- What was the facility's function?
- Has service been interrupted?

Has an evacuation been ordered?

What has been done so far to counteract/control the situation?

Was anyone injured or killed?

- If so, was it an employee, a customer, a neighbor or someone else?
- Gather name, age, address, family information and hospital location.
- If employee: gather title, job description and length of employment with AWI.
- Death: How and when was the person killed?
- Injury: How and when did the injury/accident happen? What's the current medical condition of the patient?
 - Be sure to follow AWI's Incident Tracking and Reporting System guidelines.

Is there a remaining threat of danger?

- Is there continuing risk to the community, employees, environment, emergency responders and/or the facility?
- Has the area been secured from further impact?

Have proper authorities been notified?

- Emergency crews?
- Police, fire departments, emergency services?
- Government and regulatory agencies?

Are the media aware of the event?

- Are reporters or TV news crews on site?
- Have any media calls been received?
- Is a log or record being kept of those calls?
- Has a media monitoring routine been established?

Has this type of event happened to AWI or at an AWI facility before?

Does AWI have a track record (successful or negative) regarding this area of operation?

- Quality/safety records
- Insurance
- Regulatory agency records/approvals (date of last inspection?)

What is the estimated loss (in dollars) from property damage?

- What was the extent of insurance coverage?
- How much did the facility cost at the time of construction?

What feedback has AWI heard from regulatory agencies?

If it is a product related issue, to what extent is it known to the supply chain and/or distribution channel/customers?

Additional communication considerations

External communication needs

- Develop a communications strategy based on available facts
- Assess and quantify media interest
- Draft position statement
- Do we have the appropriate communication materials on the web site?
- Draft and distribute (as required) holding statements, fact sheets, Q&A document, etc.
- Prepare spokesperson(s) as required
- Counsel the IMT on communications implications of future actions
- Arrange for media monitoring
- Establish a "press office" to field and log media queries
- Coordinate with counterparts at emergency and regulatory agencies as required

Internal communication needs

- Brief the IMT on relevant communications issues
- What do employees already know (first hand observations or media coverage)?
- Identify direct impacts to employees
- Coordinate the distribution of information to CEO and senior team, BOD, employees
- Brief frontline staff (receptionists, security, etc.) of all communication and media policies
- Brief employees on media and social media policies
- Prepare, distribute Q&A or other information to staff as required
- Relay reactions to IMT

Customer Communications

- Brief sales management for any customer facing communication
- Relay reactions to the IMT
- Communicate relevant details of incident to affected customer segments
- Organize distribution of materials to appropriate customers
- Keep IMT informed of input from all customer/consumer segments
- Distribute customer FAQ to customer-facing staff

Operational impacts

- What is the impact to facilities?
- Locate facility ERP and/or business continuity plans, as appropriate
- Are back-up equipment, additional resources or capacity required?
- Extract relevant policies and procedures related to the incident
- Consider the people and material related to the incident (training, experience, appropriateness, etc.)
- What information about the operation or operating practices might be useful to the creation of communication materials or contact with employees or regulators?
- Brief management on communication implications of operational issues or impacts as a result of the incident
- Determine if there is insurance exposure and notify relevant insurance carriers

Regulators or other government officials

- Have the appropriate local, state or federal /government officials been notified?
- Assemble information as to regulatory compliance
- Coordinate communications with agencies (as appropriate)
- Assign communications liaison for each agency involved
- Prepare/modify statement for government officials
- Ongoing communications with appropriate officials as required
- Relay reactions to IMT

Are there other audiences that need to be informed?

- Who else needs to be involved or informed?
- What long term ramifications might need attention now?

Critical documents

The following key documents may or may not be intended for public distribution, but should be drafted as early as possible to save valuable time while an incident is unfolding. Some of these documents can and should be drafted and “sit on a shelf” to pull off and revise as needed.

- **Position Statement** – This is a succinct expression of the organization’s character in the context of a particular incident. It should reflect the way the organization needs to be perceived and understood by a range of audiences. A position statement is *not* a recitation of the facts of the particular crisis. Rather, it is an expression of character, purpose or experience that can be used as the core idea in all communication vehicles (e.g. holding statements, news releases or letters to key audiences). A position statement is an internal document for the IMT and is not intended for internal or external distribution.
- **Key Messages/Talking Points** – A short list of key messages that should be incorporated with all internal and external communication.
- **Q&A** – A comprehensive collection of all likely questions – particularly those most difficult to address – that may be posed by the media or others. This document, which should be continually reviewed and revised, is drafted to explore various worst-case scenario questions that may be asked by any or a combination of AWI audiences. This document is incident specific and is meant for internal distribution only.

- **Letters to Key Audiences** – Drafts with carefully written language that draw upon the position statement addressing the particular concerns of each audience in a direct, personal manner (e.g., employees, customers, board members, health officials, and others). In each case, the most appropriate format for delivery should be used (overnight delivery, e-mail or verbal communication).
- **News Releases** – When and as necessary, news releases will provide new information, the company position or clarification regarding the situation. News releases, which will be reviewed and approved by the IMT leader, may be distributed widely through direct and electronic wire services (BusinessWire, PR Newswire, etc.) as a means to achieve the broadest possible coverage when that is appropriate.
- **Notification Matrix** – A list of contacts should be prepared in advance and should include all relevant management contacts, government agency contacts, a current regional media list and internal contacts, including all employees, contractors and vendors. It may be necessary to inform employees of events that require them to either come to work quickly or stay away from the facility, depending on circumstances. Appropriate lists can and should be developed and maintained by each IMT member with respect to his/her functional responsibility on the team.
- **Media Monitoring** – The communications representative should be responsible for canvassing and monitoring any media coverage during a crisis situation. If the event is limited to a specific region then local review of newspapers and electronic media can be managed at the site. For larger scale events, media monitoring services such as Video Monitor Services, Bacons, Factiva, should be used.
- **Facility specific ERPs**

Digital Communication Guidelines

We need to be sure that as we manage our business – particularly when we are managing through difficult or unusual incidents – that we take particular care with all of our digital communication, both internally and externally. Whenever we have activated this IMP, we need to take additional care and responsibility with all email, voicemail and mobile phone text and social media messages. The Core Team legal counsel will provide specific instructions in situations where information needs to remain privileged. Please consider the following guidelines with respect to all information and communication that is sent or received by these channels:

- To limit misunderstanding of communication, use direct communication (face-to-face meetings or interactive conversation over the phone) to the extent possible. While direct communication may have greater constraints, be mindful that email, voice mail text and social media messages create a digital record that can be easily disseminated far beyond the intent of the original sender, that that record is permanent and does not cease to exist when it is “deleted” from the system, and that when retrieved by persons outside of the working group will necessarily be read out of context.
- Internal IMT communications are to be considered **confidential**. These conversations should take place in a private area, with only the intended audience. You should be particularly circumspect with respect to digital communications. Since you may not know what arrangements the intended recipient of your digital message may have with third parties for retrieving their incoming messages or sharing their communications equipment, don’t leave an email, text message or voice mail message that you would not want others to read or hear.

- Please take particular care with the content of any outgoing email messages related to any incident that we may be managing. It is best to keep all of your communication factual, concise and professional. Do not overstate or understate your message. Refrain from speculation, drawing inferences, articulating conclusions or placing blame on too little data. What appears “obvious” in the early hours or days of an incident is often quite far from the actuality when all the facts are known after the investigation has been completed. Also, remember that humor and sarcasm may be misunderstood or misconstrued in hindsight or completely lost on a written transcription of a message that inherently does not capture tone of voice or oral emphasis.
- Take particular care to preserve all digital communication related to an incident when you are working in support of the IMT. That means all email or text messages that you may send or receive. Voice mail messages that pertain to the incident should be retained as well, to the extent that may be practical or technically feasible.
- All email that is sent or received related to the incident should be retained in a separate Outlook folder. You should consider creating an incident specific folder as soon as practical so that all email on the topic can be stored separately.
- Whenever practical, you should avoid using a personal email account or a personal phone to exchange messages or share information related to any incident that we are managing. When you are communicating or sharing information related to any incident in support of the IMT, you should use your AWI email platform or a company-provided mobile device, if applicable.
- If you make notes of a conversation whether in person or over the phone, those should be preserved as well in accordance with legal guidelines. You may either email yourself the notes and preserve the email, or give the notes to the incident legal representative.
- If you have a personal blog or presence on a social media network (e.g., Facebook, Flickr, Twitter, etc.) please review the social media guidelines in this plan.

Our purpose in following these guidelines is to protect information related to any incident and to enable us to recall important data and decision points and cast them in the appropriate context. Careful management of all digital communication is essential to the effective management of any incident and we need the cooperation of everyone working on any incident in support of the IMT.

MEDIA RELATIONS POLICIES AND PROCEDURES

Media Protocol

AWI is a public-facing and publicly-owned company with a visible brand, so anything that affects our business may result in media interest. To be constructive and responsive to media interest, it's important every employee complies with the **AWI Policy GP-10.B, Media, Endorsements and External Communications**.

Reporters or TV crews can telephone or appear unexpectedly at manufacturing facilities or corporate headquarters.

All media inquiries should be directed to the Media Hotline at 1.866.321.6677 or to Jennifer Johnson, Senior Manager, Corporate Communications at 717.725.2895.

By ensuring that all inquiries go through this appropriate channel, we are able to keep our messages to the public consistent and clear.

Media Do's and Don'ts

Do:

- If media contacts you by phone: Inform the reporter, "I am not the right contact for you. Let me direct you to our Media Hotline. It's 1.866.321.6677."
- If media turns up on site: Inform the reporter "I am not authorized to allow you on site without prior permission. Let me direct you to our Media Hotline. It's 1.866.321.6677."
- Request the reporter's name, clarify correct spelling, phone number(s) and email and publication or station they represent.
- Thank the reporter for his or her interest and assure him or her you will do your best to have someone in Corporate Communications respond as quickly as possible.
- Call or email Jennifer Johnson, Senior Manager, Corporate Communications, 717.725.2895 (cell phone) or jenniferjohnson@armstrongceilings.com, and give her the media contact information you collected.

Don't:

- Don't answer the reporter's questions, even if they seem simple and straightforward, as only authorized spokespersons may speak on behalf of AWI.
- Don't say "no comment" in response to questions. Inform the reporter, "I am not the right contact for you. Let me direct you to our Media Hotline. It's 1.866.321.6677."
- Don't respond to claims that a reporter has obtained permission to interview you from your supervisor. Assure him or her that you will have the right contact respond to him or her shortly.
- Don't conference call or call Jennifer Johnson or management while the reporter is with or around you. If you are having difficulty with the reporter, call your supervisor/facility security.

Social Media Protocol

“Social media” includes all forms of public, Web-based communication and expression that bring people together by making it easy to publish content to many audiences. By posting content about AWI or its products and services, you associate yourself with the brand and assume liability for both yourself and AWI. Therefore, all communications must be consistent with the **AWI Social Media Policy GP-10.A**. If you are an authorized online spokesperson, anything that references AWI within your posts requires disclosure that you work for the company or are otherwise associated with AWI.

Employee may join, follow, subscribe, or “like” sites AWI has created to help promote products, programs or services (such as AWI for Education).

Certain AWI personnel are designated as authorized online spokespeople. Our Legal Department, along with corporate communication and the appropriate business unit leaders, manages comments and concerns about the company that involve risk to the public’s health or safety, financial information or other topics. Only authorized spokespeople are permitted to produce on-line branded content on behalf of AWI.

Media Monitoring Protocols

Sharing and Evaluating Coverage

Corporate Communications will coordinate media monitoring and analysis. The frequency of monitoring will depend on the severity of the incident. Following are best practices on frequency:

- First 24 hours: Monitoring conducted hourly, with summary provided at the end of day one to the incident management team.
- Day 2: Monitoring conducted in the morning, early afternoon and end of day, with summary provided at the end of the day to the incident management team.
- Day 3: Monitoring conducted in the morning and at the end of the day, with summary provided at the end of the day to the incident management team.
- Day 4 and onward: Ongoing monitoring with summaries developed as needed.

Coverage will be evaluated as follows:

- Scope and volume of coverage (national or regional; print, broadcast or online; original stories or repeated wire stories).
- Tone of coverage (positive, negative, neutral; factual vs. commentary).
- Visibility of AWI key messages.
- Frequency of quotes from AWI spokespeople, other stakeholders.
- Momentum of coverage – is it in our favor?
- Placement of stories (front page, regional section, brief or full story)

Traditional Media Monitoring

- Use news alerts (e.g. www.news.google.com).
- Check local, regional and national media outlet websites for video and audio clips, reporter blog postings, written excerpts of newscasts and print stories.
- Contact Cision Media Monitoring Service to coordinate print, radio and TV monitoring. We have an account with that service. Cision can provide updates as often as hourly via email. TV can also be monitored through TV Eyes (www.tveyes.com).

Social Media Monitoring

- Visit social media sites such as www.facebook.com for information related to the situation.
- Conduct a blog search on www.technorati.com and subscribe to Google Blog Alerts (e.g. www.blogsearch.google.com) to monitor comments on the situation.
- Monitor Twitter (www.search.twitter.com) for postings.
- Check YouTube (www.youtube.com) and Flickr (www.flickr.com) for video or images. Coordinate with eMarketing group as necessary.

APPENDIX

AWI Incident Management Team - Contact List

Core Team Role	Responsibilities	1 st	2 nd	3 rd
Team Leader	<ul style="list-style-type: none"> Overall team lead, not “functional player” Facilitate decisions Manage high level plan Interface with CEO & Board of Directors 	Determined by incident type from Core Team pool	N/A	N/A
Operations	<ul style="list-style-type: none"> Functional lead Coordinates operational response 	Mike Winters VP, Operations America 717-396-6020 (office) 717-413-4027 (cell) mcwinters@armstrongceilings.com Admin: Sara Bernot ext. 4317	Bill Henshaw Dir, Business Operations 717-396-6403 (office) 717-368-4247 (cell) wmhenshaw@armstrongceilings.com Admin: Lacy Brayboy ext. 2287	N/A
Human Resources	<ul style="list-style-type: none"> Functional lead Coordinates employee related resources, policies and issues 	Ellen Romano SVP, HR 717-396-2412 (office) 717-725-4062 (cell) erromano@armstrongceilings.com Admin: Sheri Charles ext. 3371	Beverly Doody VP, Talent Management 717 396-5460 (office) 717 917-0599 (cell) bdooddy@armstrongceilings.com Admin: Heidi Vaitl ext. 2287	Lara Kreider VP Human Resources 717-396-3594 (office) 717-471-8528 (cell) lrkreider@armstrongceilings.com Admin: Sheri Charles ext. 3371
Legal	<ul style="list-style-type: none"> Functional lead Coordinates legal, compliance and corporate governance issues 	Mark Hershey SVP, General Counsel & CCO 717-396-3434 (office) 484-368-1830 (cell) mahershey@armstrongceilings.com Admin: Sheri Snyder ext. 3567	Melinda Morrison Dir, Labor Emp & Lit Gen Counsel 717-396-4022 (office) 717-917-4154 (cell) mlmorrison@armstrongceilings.com Admin: Sheri Snyder ext. 3567	Sherry Horner Manager, Compliance & Legal Opers 717-396-5921 (office) 717-449-3740 (cell) srhorner@armstrongceilings.com Admin: Sheri Snyder ext. 3567

Core Team Role	Responsibilities	1 st	2 nd	3 rd
Communications	<ul style="list-style-type: none"> • Functional lead • Coordinates internal communications and external media/PR, government relations, community relations 	<p>Jennifer Johnson Dir, Corporate Communications 717-396-3393 (office) 717-725-2895 (cell) jenniferjohnson@armstrongceilings.com</p>	<p>Hill & Knowlton <u>Kevin Elliott</u> Senior Vice President 415-281-7150 (office) 415-307-1252 (cell)</p> <p>Sard Verbinnen <u>Paul Verbinnen</u> 212-687-8080 (office) pv@sardverb.com</p>	
Project Manager	<ul style="list-style-type: none"> • Coordinates plans and actions using defined systems and processes • Works under the direction of the IMT legal lead regarding document creation and retention 	<p>Rob Emery Process Improvement Champion 717-396-5284 (office) 717-598-6619 (cell) rwemery@armstrongceilings.com</p>	<p>Noel Critchlow Process Improvement Champion 717-396-5731 (office) 717-449-0551 (cell) nlcritchlow@armstrongceilings.com</p>	

Extended Team – Engagement to be determined by Core Team based on type of incident, geography and resource availability				
Role	Responsibilities	1st	2nd	3rd
EMEA	Regional impact and response planning for the region / country impacted	Wilfred Middel	Mark Laikin	Country Manager, as applicable
Asia Pacific	Regional impact and response planning for the region / country impacted	Mike Jenkins	Gary Sun	Country Manager, as applicable
Finance	Budget, risk	Brian MacNeal, CFO	Steve McNamara, Controller	
Investor Relations	Manage relationship with the “Street”, bankers, shareholder community	Thomas Waters, Dir, Corp Finance	Dan Sullivan, Finance Associate	
Operations	Business continuity at plants	Affected plant manager(s)		
EHS	Environmental, Health and Safety protocols and management	John Ackiewicz, SR Global Mgr, EH&S	Chad Franciscus	Plant EHS Manager
Facilities/Security	Physical building issues and protection (e.g., room configuration, additional security personnel, etc.)	John Bertz, VP Technology & AS Operations	Karen Spina, Facility Operations Mgr	
IT	Physical and virtual data and business systems access and support	Dawn Kirchner King, CIO	Craig Nadig, Dir, Customer Solutions & Business Transactions	Sharon Harting, Sr Mgr, Project Mgmt Svcs & IT Finance
Logistics	Movement of materials, Trade compliance, CTPAT	Greg Estabrook, Dir Prod/Dist	Bernadette Purcell, Trade Compliance Mgr	
Regional Executive	As appropriate, based on the location of the incident			
Sales / Go To Market	Customer relations concerns	Paul Corr, VP, Sales East Mark Olson, VP Sales West Jill Crager, Dir, Customer Service	Nick Taraborelli, Director New Product Development	
eMarketing	Social Media Monitoring	External communications firm		
HR	As needed or requested by Core Team			
Legal	As needed or requested by Core Team			

Summary of Critical IMT Action Steps

	ACTION	OWNER	STATUS
	Receive notification from the operating executive		
	Core team member hits “reply all” and contacts the operating executive by phone for details		
	The IMT Core Team convenes: <ul style="list-style-type: none"> ┆ Describe the problem ┆ Identify a team leader ┆ Notify senior executives and/or the board of directors 		
	Review and/or gather key initial facts: <ul style="list-style-type: none"> ┆ Who or what is exposed to harm or risk? ┆ How is any negative impact defined? ┆ Is there a similar history at this facility? ┆ Are there financial impacts? ┆ Who is involved in the response? ┆ What are we hearing from responders / regulators? ┆ Do we have a spokesperson? ┆ Who else is talking about the situation? 		
	Assess severity and scope: <ul style="list-style-type: none"> ┆ Is the issue local? ┆ Are there risks of harm to people? ┆ Is there risk of adverse media interest? ┆ Who else needs to know and what? 		
	Verify key facts before proceeding		
	Assess communication: what are we hearing from... <ul style="list-style-type: none"> ┆ Employees and families ┆ Media, including social ┆ Direct communication with stakeholders and public ┆ Investors, board members ┆ What do employees and/or the public know? ┆ Message pull-through 		
	Develop a position		
	Identify any required Extended Team resources		
	Assign response tasks – establish measurement and monitoring		

Scenario A: Environmental incident

Description

Contamination or emission from any AWI property or industrial activity that significantly and adversely harms the environment; an incident that involves damage and/or adverse impact to air, land, water or any public or private property; an incident that creates significant temporary or lasting health effects.

Checklist of Considerations

- What is the immediate and visible impact to people and the environment?
- What do we know about the circumstances that led to this incident?
- What is the history of this facility? Have there been other environmental incidents of this type in the past?
- Do we have an environmental compliance expert available?
- Are we coordinating with the local emergency response teams?
- Do we have a record of environmental compliance or non-compliance at this site? (Check the Incident Tracking and Reporting System.)
- How are we monitoring or measuring the impact of the incident?
- Do we have all the necessary material safety data sheets for the emergency responders and regulators?
- How effective are the authorities in managing public anxiety? Are they taking the lead?
- Are there governmental or regulatory implications to this incident?
- Do we have equipment or expertise elsewhere that we can lend the local responders?

Extended team additions to consider

- Operations
- Compliance (Product)
- Regional executive
- Finance
- EH&S
- Social media monitoring
- Ad hoc: independent environmental specialist, medical expert, employee assistance providers (this is a 3rd party provider)

Decision Tree

Are AWI or AWI employees deliberately complicit in the incident?

Yes →
No

Did the incident occur as a result of faulty operational procedures or employee or company negligence on the part of AWI?

Yes →
No

Did AWI or AWI employees violate any laws or regulations related to this incident?

Yes →
No

Did the incident result in harm to any employees, customers or the community?

Yes →
No

Does the incident have the potential for adverse impact beyond the local facility or geography?

Yes →
No

Is there a history at this facility or in this geography that will create added sensitivity?

Yes →
No

Are there gaps in compliance reporting or a history of compliance problems related to this facility or activity?

Yes
No

**Alert
management
and activate
resources as
required**

Holding Statement Template

We [*description of how we feel, e.g., "concern", "regret", etc.*]that [*description of what we know*] has resulted in [*this incident*] and in particular, any [*description of impact, e.g. "harm"*] to our neighbors, our employees and others who have been impacted. From the moment we became aware of [*this incident*] we have been working with [*the local emergency responders*] to ease the impact [*of this incident*]. We will remain closely involved, bringing whatever resources we have that may be helpful in [*containing, reducing, resolving the incident*].

As we learn more about [*the incident*] [*and as response circumstances may warrant*] we will continue to provide updates to the public [*at a cadence appropriate to the circumstances*]. Importantly, we will continue to stay involved in the response until [*regulators*] are convinced that we have adequately [*addressed the incident*]. For further information, [*cite a source*].

Scenario B: Operational disruption

Description

A significant operational disruption resulting from misconduct, a preventable emergency (such as fire or explosion) or other operational upset that causes harm to employees or the community; an incident that results in the temporary or prolonged closure (full or part) of a facility such that there is significant adverse financial consequence to the company, employees, customers or the public.

Checklist of Considerations

- What is the immediate effect on any impacted parties?
- What do we know about the circumstances that led to this incident?
- Can we shift product from other facilities to meet customer needs?
- How are we assessing the near and long term impact of the incident?
- Do we have outside experts coming in to help right the disruption?
- Have we experienced a similar disruption elsewhere?
- How will we evaluate the financial impacts to AWI of this incident?
- Is it our intention today to restart and continue to operate this facility?
- What additional resources do we need that are not immediately available?
- Are we working with local regulators and authorities on a restoration plan?

Extended team additions to consider

- Operations
- Compliance (Ethics)
- Regional executive
- Finance
- EH&S
- Facilities/security
- Social media monitoring
- Employee assistance providers

Holding Statement Template

We [*description of how we feel, e.g., "concern", "regret", etc.*] the [*incident*] that has caused a disruption at our [*facility*]. While it is premature to speculate on the specific causes or origins of [*the incident*], we want to assure the public that we continue to be engaged in [*the process of remediation and recovery*] until we are operating normally again. We will continue to work with [*describe the regulators/responders and the process currently unfolding*].

For further information, [*cite a source*].

Decision Tree

Was the incident preventable or a result of misconduct or negligence?

Yes →
No

Will the facility be closed for an unknown or significant period of time?

Yes →
No

Did the incident result in harm to any employees, customers or the community?

Yes →
No

Does the incident have the potential to have a large impact beyond locally?

Yes →
No

Will there be adverse economic impact to the surrounding community from this event?

Yes →
No

**Alert
management
and activate
resources as
required**

Scenario C: Product failure

Description

The failure of any AWI product resulting in harm to customers, employees or the public; a product failure that is the result of using inferior or counterfeit materials; commission of a deliberate defrauding of customers or others by delivering knowingly inferior product without providing disclosure of the discrepancy to the customer or the public.

Checklist of Considerations

- What is the immediate effect on any impacted persons or property?
- Is there a history of this type of product failure with AWI or others?
- What do we know about the sequence of events that led to the product failure? How long has this product failure been occurring?
- Is there a means to remedy the adverse impact in the near term?
- Do we need or have independent experts to help with forensic analysis of the product in question?
- What is the scope of the failure—one location, in distribution channel, at customer locations, installed?
- Is there a likelihood of similar product failure elsewhere?
- Was there any indication that there was a potential for a product failure like this?
- Do we have the means to provide immediate relief to parties that have been adversely impacted?
- Can we provide any replacement product in the near term?

Extended team additions to consider

- Operations
- Compliance (Product)
- Finance
- EH&S
- Social media monitoring
- Ad hoc: product specialist

Holding Statement Template

We [*description of how we feel, e.g., “sorry”, “regret”, etc.*] to learn that [*describe product failure*]. We are working with [*regulator/investigator*] to learn exactly what happened to cause [*the problem*]. We have also retained [*outside experts*] to conduct an independent investigation and we will share their findings with [*the regulators/investigators*] to the extent that the answers they discover shed additional light on [*the issues at stake*].

For further information, [*cite a source*].

Decision Tree

Did the incident result in harm to any employees, customers or the community?

Yes
No



Are AWI or AWI employees deliberately complicit in the incident?

Yes
No



Did AWI or AWI employees violate any laws or regulations related to this incident?

Yes
No



Does the incident have the potential to have a large impact beyond locally?

Yes
No



Is a product recall necessary?

Yes



Would a recall be disruptive to any buildings where the product is already installed?

Yes
No



**Alert
management
and activate
resources as
required**



Scenario D: Ethics and governance

Description

An issue involving deliberate or inadvertent violations of law or company policy involving the misappropriation of property, money or other assets; a deliberate or inadvertent breach of trust of employees, vendors, partners, customers or the public; a deliberate failure to file required documents or to report activities to which either regulators or the public are entitled; a breach of good conduct by senior executives; illegal or unethical actions on the part of any AWI employees that causes material harm to other employees, the company, suppliers or the public.

Checklist of Considerations

- What is the extent of any harm to AWI, other persons or the public?
- Who at AWI is involved: names, titles, length of service, company locations?
- Who outside of AWI is involved: names, titles, company name, affiliation with AWI?
- What specific rules or laws are alleged to have been violated?
- Do we have a complete timeline that led to this incident?
- Do we know how the issue came to the surface?
- Who should have known the issues surrounding the breach that occurred?
- Do we have a succession plan for any executive(s) involved in the event that is required?
- Are we aware of any history of similar lapses or even 'near misses' that are similar?
- Can we quantify the damage arising out of the alleged violation?
- Are there remedies that are immediately available?
- Do the circumstances require particular subject matter expertise?
- Did the subject of the incident benefit financially or in some other way?

Extended team additions to consider

- Finance
- Compliance (Ethics)
- Ad hoc: outside legal counsel

Holding Statement Template

We were [*description of how we feel, e.g., "concern", "regret", etc.*] to learn that [*describe incident*]. We are working with [*regulator/investigator*] to learn exactly what happened. We have also retained [*outside experts*] to conduct an independent investigation and we will share their findings with [*the regulators/investigators*] to the extent that the answers they discover shed additional light on [*the issues at stake*].

These actions [*by persons responsible*] do not uphold the standards of conduct to which we hold ourselves as a company and as individuals. We will continue to provide updates as available and will work to restore full trust in [*our company / our executives, etc.*].

For further information, [*cite a source*].

Decision Tree

Did the incident result in harm to any employees, customers or the community?

Yes
No



Are AWI or AWI employees deliberately complicit in the incident?

Yes
No



Did AWI or AWI employees violate any laws or regulations related to this incident?

Yes
No



Does the incident have the potential to have a broad impact?

Yes
No



Alert management and activate resources as required