

PRIVACY POLICY

American Standard Companies, Inc. ("Ideal Standard") respects individual privacy and values the confidence of its customers, employees, vendors, consumers, business partners and others. Ideal Standard strives to collect, use and disclose Personal information in a manner consistent with the laws of the countries in which it does business, and has a tradition of upholding the highest ethical standards in its business practices. Ideal Standard abides by the Safe Harbor Principles developed by the U.S. Department of Commerce and the European Commission and the Frequently Asked Questions (FAQs) issued by the Department of Commerce on July 21, 2000. This Safe Harbor Privacy Policy (the "Policy") sets forth the privacy principles that Ideal Standard follows with respect to transfers of Personal information anywhere in the world, including transfers from the European Economic Area (EEA) (which includes the fifteen member states of the European Union (EU) plus Iceland, Liechtenstein and Norway) to the United States.

I. SAFE HARBOR

The United States Department of Commerce and the European Commission have agreed on a set of data protection principles and frequently asked questions (the "Safe Harbor Principles") to enable US companies to satisfy the requirement under European Union law that adequate protection be given to Personal information transferred from the EU to the United States. The EEA also has recognized the US Safe Harbor as providing adequate data protection (OJ L 45, 15.2.2001, p.47). Consistent with its commitment to protect Personal privacy, American Standard adheres to the Safe Harbor Principles.

Ideal Standard has a Chief Privacy Officer who is responsible for Ideal Standard's compliance with and enforcement of this Policy. Ideal Standard also has a Global Director of Data Protection who assists in ensuring compliance with this Policy and data security issues. Ideal Standard educates its employees concerning compliance with this Policy and has self-assessment procedures in place to assure compliance. Ideal Standard's Chief Privacy Officer Barbara A. Sellinger, Global Director of Data Protection Hugh C. Welsh, and Corporate Legal Team are available to any of its valued employees, customers, vendors, business partners or others who may have questions concerning this Policy or data security practices. Relevant contact information is provided herein.

II. SCOPE

This Policy applies to all Personal information received by Ideal Standard in any format including electronic, paper or verbal. Ideal Standard collects and processes Personal information concerning current and former employees and their respective family members, as well as applicants for employment through its Internet websites, its intranet site, electronic mail and manually. Ideal Standard is the sole owner of information it collects from current and former employees, applicants for employment, customers, vendors and others. Ideal Standard will not sell or share this information with third parties in ways different than what is disclosed in this Privacy Policy. On a global basis, Ideal Standard will, and will cause its affiliates to, establish and maintain business procedures that are consistent with this Policy.

Personal information collected by Ideal Standard from employees and applicants for employment is maintained at its corporate offices in Piscataway, New Jersey in the United States as well as the local office of the employee or applicant. Ideal Standard collects Personal information for, among other things, legitimate human resource business reasons such as payroll administration; filling employment positions; maintaining accurate benefits records; meeting governmental reporting requirements; security, health and safety management; performance management; company network access; and authentication. Ideal Standard does not request or gather information regarding political opinions, religion, philosophy or sexual preference. To the extent Ideal Standard maintains information on an individual's medical health or ethnicity (as legally required), Ideal Standard will protect, secure and use that information in a manner consistent with this Policy.

Personal information collected by Ideal Standard from prospective customers, consumers, vendors, business partners and others may be maintained at its corporate offices in Piscataway, New Jersey or at other American Standard facilities. Ideal Standard collects Personal information for, among other things, legitimate business reasons such as customer service; product, warranty and claims administration; meeting governmental reporting and records requirements; maintenance of accurate accounts payable and receivable records; internal marketing research; safety and performance management; financial and sales data; and contact information. All Personal information collected by Ideal Standard will be used for legitimate business purposes consistent with this Policy.

III. DEFINITIONS

For purposes of this Policy, the following definitions shall apply:

"Agent" means any third party that uses Personal information provided by Ideal Standard to perform tasks on behalf of or at the instruction of Ideal Standard.

"Ideal Standard" means American Standard Companies, Inc., its predecessors, successors, subsidiaries, divisions and groups.

"Personal information" means any information or set of information that identifies or could be used by or on behalf of Ideal Standard to identify an individual. Personal information does not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public Personal information.

"Sensitive Personal information" means Personal information that reveals race, ethnic origin, trade union membership, or that concerns health. In addition, Ideal Standard will treat as sensitive Personal information any information received from a third party where that third party treats and identifies the information as sensitive.

IV. PRIVACY PRINCIPLES

The privacy principles in this Policy are based on the seven Safe Harbor Principles.

(1) NOTICE:

Where Ideal Standard collects Personal information directly from individuals, it will inform them about the purposes for which it collects and uses Personal information about them, the types of non-agent third parties to which Ideal Standard discloses that information, and the choices and means, if any, Ideal Standard offers individuals for limiting the use and disclosure of their Personal information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal information to Ideal Standard, or as soon as practicable thereafter, and in any event before Ideal Standard uses the information for a purpose other than that for which it was originally collected. Ideal Standard may disclose Personal information if required to do so by law or to protect and defend the rights or property of Ideal Standard.

(2) CHOICE:

Ideal Standard will offer individuals the opportunity to choose (opt-out) whether their Personal information is (a) to be disclosed to a non-agent third party, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

For sensitive Personal information, Ideal Standard will give individuals the opportunity to affirmatively and explicitly (opt-in) consent to the disclosure of the information to a non-agent third party or the use of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

Ideal Standard will provide individuals with reasonable mechanisms to exercise their choices should requisite circumstances arise.

(3) DATA INTEGRITY:

Ideal Standard will use Personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. Ideal Standard will take reasonable steps to ensure that Personal information is relevant to its intended use, accurate, complete and current.

(4) TRANSFERS TO AGENTS:

Ideal Standard will obtain assurances from its Agents that they will safeguard Personal information consistently with this Policy. Examples of appropriate assurances that may be provided by Agents include: a contract obligating the Agent to provide at least the same level of protection as is required by the relevant Safe Harbor Principles, being subject to EU Directive 95/46/EC (the EU Data Protection Directive), Safe Harbor certification by the Agent, or being subject to another European Commission adequacy finding (e.g., companies located in Hungary and Switzerland). Where Ideal Standard has knowledge that an Agent is using or disclosing Personal information in a manner contrary to this Policy, Ideal Standard will take reasonable steps to prevent or stop the use or disclosure. Ideal Standard holds its Agents accountable for maintaining the trust our employees and customers place in the company.

(5) ACCESS AND CORRECTION:

Upon request, Ideal Standard will grant individuals reasonable access to Personal information that it holds about them. In addition, Ideal Standard will take reasonable steps to permit individuals to correct, amend or delete information that is demonstrated to be inaccurate or incomplete. Any employees that desire to review or update their Personal information can do so by contacting their local Human Resources Representative.

(6) SECURITY:

Ideal Standard will take reasonable precautions to protect Personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction. Ideal Standard protects data in many ways. Physical security is designed to prevent unauthorized access to database equipment and hard copies of sensitive Personal information. Electronic security measures continuously monitor access to our servers and provide protection from hacking or other unauthorized access from remote locations. This protection includes the use of firewalls, restricted access and encryption technology. Ideal Standard limits access to Personal information and data to those persons in Ideal Standard's organization, or as agents of Ideal Standard, that have a specific business purpose for maintaining and processing such Personal information and data. Individuals who have been granted access to Personal information are aware of their responsibilities to protect the security, confidentiality and integrity of that information and have been provided training and instruction on how to do so.

(7) ENFORCEMENT:

Ideal Standard will conduct compliance audits of its relevant privacy practices to verify adherence to this Policy and the US Department of Commerce Safe Harbor Principles. Any employee that Ideal Standard determines is in violation of this Policy will be subject to disciplinary action up to and including termination of employment.

V. DISPUTE RESOLUTION

Any questions or concerns regarding the use or disclosure of Personal information should be directed to the Ideal Standard Privacy Office at the address given below. Ideal Standard will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal information in accordance with the principles contained in this Policy. For complaints that cannot be resolved between Ideal Standard and the complainant, Ideal Standard has agreed to participate in the dispute resolution procedures of the panel established by the European data protection authorities to resolve disputes pursuant to the Safe Harbor Principles.

VI. INTERNET PRIVACY

Ideal Standard sees the Internet, intranets and the use of other technologies as valuable tools for communicating and interacting with consumers, employees, vendors, business partners and others. Ideal Standard recognizes the importance of maintaining the privacy of Personal information collected through websites that it operates. Ideal Standard's sole purpose for operating its websites is to provide information concerning products and services to the public. In general, visitors can reach Ideal Standard on the Web without revealing any Personal information. Visitors on the Web may elect to voluntarily provide Personal information via Ideal Standard websites but are not required to do so. Ideal Standard collects information from visitors to the websites who voluntarily provide Personal information by filling out and submitting online questionnaires concerning feedback on the website, requesting information on products or services, or seeking employment. The Personal information voluntarily provided by website users is contact information limited to the user's name, home and/or business address, phone numbers and email address. Ideal Standard collects this information so it may answer questions and forward requested information. Ideal Standard does not sell or share this information with non-agent third parties.

Ideal Standard may also collect anonymous information concerning website users through the use of "cookies" in order to provide better customer service. "Cookies" are small files that websites place on users' computers to identify the user and enhance the website experience. None of this information is reviewed at an individual level. Visitors may set their browsers to provide notice before they receive a cookie, giving the opportunity to decide whether to accept the cookie. Visitors can also set their browsers to turn off cookies. If visitors do so, however, some areas of Ideal Standard websites may not function properly.

Few, if any, of Ideal Standard's websites are directed toward children. Nevertheless, Ideal Standard is committed to complying with applicable

laws and requirements, such as the United States' Children's Online Privacy Protection Act ("COPPA").

Ideal Standard website users have the option to request that Ideal Standard not use information previously provided, correct information previously provided, or remove information previously provided to Ideal Standard. Those that would like to correct or suppress information they have provided to Ideal Standard should forward such inquiries to:

American Standard Companies Privacy Inquiries
One Centennial Avenue
Piscataway, New Jersey
08855-6820
Attention: Hugh C. Welsh, Global Director of Data Protection

The inquiries should include the individual's name, address, and other relevant contact information (phone number, email address). Ideal Standard will use all reasonable efforts to honour such requests as quickly as possible.

Ideal Standard websites may contain links to other "non-American Standard" websites. Ideal Standard assumes no responsibility for the content or the privacy policies and practices on those websites. Ideal Standard encourages all users to read the privacy statements of those sites; their privacy practices may differ from those of Ideal Standard.

VII. CHANGES TO THIS SAFE HARBOR PRIVACY POLICY

The practices described in this Policy are current Personal data protection policies as of December 31, 2001. Ideal Standard reserves the right to modify or amend this Policy at any time consistent with the requirements of the Safe Harbor Principles. Appropriate public notice will be given concerning such amendments.