

HIGH-RISK MINERALS POLICY

July 2020

The high-risk minerals policy is based on our Principles of Conduct and Action, the Group's core values that define our vision of a responsible company, and the reference for the Group's Responsible Purchasing policy. It is aligned with our Purpose: "Make the world a better home".

Taking into account all stakeholders expectations (investors, NGO, international organizations like OECD, customers, governments, ...) the Saint-Gobain scope for the high-risk minerals policy is: Tin, Tantalum, Tungsten, Gold (3TG), Cobalt and Mica.

Our commitment to the responsible procurement of high-risk minerals is vital to the integrity and sustainability of our supply chain. That is why we are committed to acting ethically and responsibly along all aspects of the value chain with particular focus to preserve decent working conditions and biodiversity.

Through these actions, we are committed to fighting human rights abuses, such as child labor practices, financing armed conflicts and terrorism.

Our willingness is essential to more efficiently and preemptively mitigate unethical practices that threaten the future of the communities where these high-risk minerals are sourced.

OUR APPROACH

We wish to make a positive contribution within the full scope of people and entities involved in the supply chain to develop ethically, environmentally and socially secure supply chains.

Purchasing categories are carried out at different levels in the value chain. This high-risk minerals policy applies to:

- Non-trading purchases of Industrial activities: all minerals for production processes, final products and all minerals embedded in electronic and electric components included into final products sold by Saint-Gobain;
- Trading purchases of the Distribution activities: depending on the identified risks during the Responsible Purchasing process.

The implementation of these commitments is based on international best practices which are relevant in their approach and guarantee continuous progress:

- OECD Due Diligence Guidance for Responsible Mineral Supply Chains from Conflict-Affected and High Risk Area;
- Sectorial initiatives: Responsible Minerals Initiative, Responsible Mica Initiative.



Where these international standards differ from national laws or local norms, we respect local regulations while working to apply international Responsible Purchasing standards as comprehensively as possible.

We are attentive to non-governmental organizations involved and new technologies in these fields and are engaged in dialogue as part of a process of continuous improvement.

OUR ACTIONS

The high-risk Minerals policy is based on a method of due diligence. As part of the Responsible Purchasing policy, the analysis of risks linked to the minerals categories and/or countries of mines and smelters enables us to identify the suppliers for which we will implement a strategy to mitigate identified risks.

In order to mitigate risks, we collaborate with our direct suppliers to ensure traceability and data consistency:

- Reports concerning Tin, Tantalum, Tungsten, Gold (3TG) and Cobalt are issued with CMRT (Conflict Minerals Reporting Template) and CRT (Cobalt Reporting Template) from Responsible Minerals Initiative.
- Focused due diligences are launched according to stakeholders' expectations, and specifically the customers' requests, as an important actor of the value chain.

Based on reviewed information, the compliance of 3TG and Cobalt's smelters could be checked according to third party onsite audits validated by Responsible Minerals Initiative.

For Mica purchases, the level of due diligence is linked to the Responsible Purchasing procedures.

Corrective action plans with the supplier will be developed depending on the results of the assessment process.

In addition to these due diligence actions, a standard systematic clause is to be included into all relevant contracts / purchase orders, where there is direct purchases of such products contained in Saint-Gobain final goods sold.



GOVERNANCE AND STAKEHOLDER DIALOGUE

The high-risk Minerals Policy is monitored annually and presented to the Responsible Purchasing Steering Committee chaired by the Group's Chief Operating Officer in the presence of the General Secretary in charge of Corporate Social Responsibility (CSR).

The Chief Purchasing Officer oversees compliance with the policy.

High-risk minerals purchases are in the Responsible Purchasing scope, ensuring that procedures are updated in line with changes in risks and regulations and with the development of secure supply chains and training for buyers.

Each country CEO and/or business CEO is responsible for the application and promotion of this policy in the countries under his or her responsibility.

A professional alert system is open to suppliers in order to collect incident reports. Information related to this system is available on the Group's website.

We are committed to open dialogue with stakeholders potentially impacted by our high-risks minerals purchases.

We are committed to communicating our progress and challenges in a regular and transparent manner.