

 <b>DOCTRINE</b> <b>GROUP</b>	<b>1: GROUP ORGANISATION AND PROCEDURES</b>	
	<b>ETHICS AND COMPLIANCE</b>	
	<b>LOBBYING POLICY</b>	
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Document name	Lobbying Policy
Objective	To provide a framework for responsible lobbying activities
Related documents	Anti-corruption policy, Gifts and invitation, Sponsoring & patronage and Trade associations Procedures
Persons concerned	Employees, corporate officers, Group executives in contact with political officeholders, administrations or governments.
Languages	French and English Translations into other languages: <b>E&amp;C in the Regions</b>
Confidentiality	External, published on <a href="https://www.saint-gobain.com">https://www.saint-gobain.com</a>
Local adaptation	Authorised to take account of local legal obligations, without however limiting the transparency of our actions.
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## Foreword

The Saint-Gobain Group is committed to maintaining an ethical and constructive dialogue with governments, parliaments, local elected representatives etc. and their administrations, directly or indirectly through trade associations, civil society representative bodies, including non-governmental organizations (NGOs), where relevant to our activities.

The purpose of our commitments is twofold:

- To make Saint-Gobain's case to key external audiences, particularly with a view to promoting light and sustainable construction that is more comfortable for occupants and easier for professionals to implement, more energy efficient and less consumptive of the planet's resources,
- Provide external information to help us better understand the risks and opportunities in our business sectors.

This policy is based on the Principles of Conduct and Action, and in particular on the principles of Integrity and Loyalty, which require each of the Group's employees, whatever their hierarchical level and function, to reject all forms of corruption and to be transparent in their actions.

### I. Purpose and scope

Saint-Gobain, as a leader in light and sustainable construction, considers it its duty to be proactive and to participate in the dialogue accompanying the drafting of regulations in the countries in which the Group operates when these are likely to improve the living conditions of citizens and the quality of sustainable construction and to limit negative impacts on the planet and the climate.

#### a) Definition and characteristics of lobbying

Lobbying includes activities carried out with the aim of influencing the **formulation or implementation** of policy or legislation, or the decision-making processes of governments, parliaments, government institutions, regulators, institutions, bodies and agencies of the European Union or standardization bodies. These activities include (but are not limited to)


- organizing or participating in meetings, conferences, events;
- contributing to/participating in public consultations, hearings or other similar initiatives;
- organizing communication campaigns, platforms and networks;
- the preparation/commissioning of policy and position papers, opinion polls, surveys, policy and position papers, open letters and research work.

In France, the definition is specific (see Appendix 1).

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Lobbying on behalf of Saint-Gobain with public decision-makers<sup>1</sup> aims to defend the interests of the Group and its subsidiaries by providing expertise that informs decision-making. Lobbying is carried out mainly via professional organizations and in some cases by interest representatives, Group employees trained for this purpose, or external professionals known as "Lobbyists".

Lobbying must comply with specific laws, codes of conduct and regulations. Where this policy provides for more stringent rules, these must be applied. If you have any difficulty in applying this policy, please contact your ethics and compliance officer at<sup>2</sup>.

 It should be noted that exchanges with administrative authorities or other public officials for the sole purpose of monitoring a public invitation to tender or an application for an authorization or license/permit do not generally fall within the scope of lobbying activities. The specificities of local regulations are set out in an appendix for each country.

## b) Good lobbying practices

The Saint-Gobain Group promotes the following best practices:

- Communicate transparently on the structure, organization and resources allocated to lobbying,
- Make public its most material positions on limiting CO2 emissions and the impact of human activities on the planet.
- Promote the adoption of best lobbying practices within the professional associations in which it participates.
- Ask third-party lobbyists to act in compliance with laws and regulations, and to behave with integrity, respect and loyalty by signing the Supplier Charter. In particular, they must clearly indicate in their interactions with public decision-makers that they represent Saint-Gobain's interests, must act with caution and clearly reject any act of corruption or influence peddling.

## II. The 6 golden rules of lobbying

1. **Each lobbying action must be defined according to a clear objective**, supported where appropriate by up-to-date, objective, verifiable information (no deliberately biased information), authorized by Management, carried out exclusively by persons authorized for this purpose, and declared on the Compliance Portal. This declaration includes the costs incurred for lobbying activities (see appendix 1).

<sup>1</sup> See appendix 2

<sup>2</sup> <https://portal.saint-gobain.com/fr/web/conform-action/who-to-contact>

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- 2. No direct or indirect payments may be made to decision-makers and institutions:**
  - Saint-Gobain does not make contributions to political parties, politicians and institutions that raise funds for the implementation of political actions of any kind.
  - Charitable contributions and other sponsorship actions must not be "disguised" contributions to political players .<sup>3</sup>
- 3. The anti-corruption policy** and related procedures, in particular the "Gifts and invitations" procedure<sup>4</sup> , must be respected.
- 4. Pressure and inappropriate or illegal behavior are not compatible with Group practices** and are contrary to the Principles of Conduct and Action.
- 5.** In the event of disagreement with the positions taken by professional associations on material subjects that concern the Group in terms of limiting CO2 emissions and the impact of human activities on the planet, **our disagreement** must be explicitly **stated** and recorded in writing.
- 6.** Finally, **Saint-Gobain does not participate in or support associations** that repeatedly take positions contrary to our commitments on climate change.

### III. Governance

The Group's lobbying policy is the responsibility of the Corporate Affairs Department, which coordinates it.

Any person in the Countries/Clusters or Regions who carries out lobbying activities falls within the scope of this policy.

The Corporate Affairs Director works in constant liaison with the Chairman and CEO and the members of the Executive Committee to prepare and coordinate contacts with public decision-makers. As such, he is responsible for designing and defining the procedures for implementing Saint-Gobain's Lobbying Policy and for ensuring that the necessary measures are implemented and complied with, in collaboration with the Ethics & Compliance Department.

The CEOs of the Clusters/Countries<sup>5</sup>/Regions or, in the case of employees of the central functions and holding companies, the members of the Group Executive Committee to whom they report,

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<sup>3</sup> [AC\\_2022.11\\_Procedure for sponsorship and patronage\\_EN.pdf](#)

<sup>4</sup> [AC\\_2022.11\\_Gifts-and-invitations\\_EN.pdf](#)

<sup>5</sup> For France, all lobbying activities must be coordinated directly by the Institutional Affairs Directorate.

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ensure the proper deployment of this policy and its day-to-day respect. Only persons authorized by the CEOs of the Clusters/Countries/Regions may engage in lobbying activities .<sup>6</sup>

In case of doubt, employees may seek advice from the CEO of the Cluster/Country/Region, their legal advisor or Head of Ethics & Compliance and, at Group level, from the Director of Corporate Affairs or the Ethics & Compliance Department.

In the event of any conduct or situation contrary to this policy, employees may, in accordance with our procedure for collecting and handling reports, bring them to the attention of their Manager, Head of Ethics and Compliance, the lawyer in charge or HR. They can also use Saint-Gobain's [SpeakUp!](#) alert system<sup>7</sup> . Reports are dealt with within a reasonable timeframe and appropriate measures are taken, regardless of the persons concerned. No Employee may be subject to retaliation for having reported, in good faith, or participated in the processing of a report.

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<sup>6</sup> For French and European institutions, the Institutional Affairs Directorate coordinates authorisations.

<sup>7</sup> <https://www.bkms-system.com/bkwebanon/report/clientInfo?cin=CwmSdg&c=-1&language=fre>

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## IV. Appendix

### Disclosure of lobbying activities on the Compliance Portal

All lobbying activities are declared on the Group's Compliance Portal before they are carried out, for authorization. In many cases, these internal declarations are used to prepare entries in public registers when these are compulsory.

Declaration: <https://app.convercent.com/>

Question	Answer
What is the purpose of the lobbying activity (describe precisely)?	Free text
Who is/are the beneficiary(ies) of the lobbying activity (the Saint-Gobain Group, an Activity, an Entity, etc.)?	Free text
When did the lobbying activity take place?	Calendar - selecting a date
What was the type of activity?	Drop-down list : <ul style="list-style-type: none"> <li>- Correspondence</li> <li>- Conversation (in person, video, telephone)</li> <li>- Expert communication</li> <li>- Meeting</li> <li>- Lunch or other entertainment</li> <li>- Other *</li> </ul>
* when Other is selected: Please describe the lobbying activity	Free text
What public decision are you trying to influence?	Free text
With whom was the lobbying done? Give name(s) and position(s)?	Free text
Select the category to which the public decision-maker belongs:	Drop-down list : <ul style="list-style-type: none"> <li>- Local authority (e.g. Mayor)</li> <li>- Administration</li> <li>- Government</li> <li>- Politician (e.g. Member of Parliament)</li> </ul>

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<b>Who carried out the lobbying activity? Indicate name(s) and position(s)</b>	Free text
<b>Please identify the name of the Saint-Gobain entity of the lobbyist(s)?</b>	Free text
<b>Additional information you consider useful :</b>	Free text

Practical guides are available on the [intranet](https://portal.saint-gobain.com/fr/web/conform-action/convercent): <https://portal.saint-gobain.com/fr/web/conform-action/convercent>