

ANTI- HARASSMENT POLICY

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The objective of this Policy is to state Saint-Gobain's position on harassment. This Policy is a global minimum standard.

Where local legislations define higher standards, entities have to comply with them as set forth in our Principles of Conduct and Action.

Each Saint-Gobain entity will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook. All new collaborators must be trained on the content of this policy as part of their induction.



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INTRODUCTION

Saint-Gobain is committed to respecting and promoting high standards of ethics as stated in our Principles of Conduct and Action. Our Diversity & Inclusion ambition is to offer equal opportunities to everyone everywhere, and we want our collaborators — no matter who they are or where in the world they live — to feel uniquely valued and safe to contribute their best.

We are convinced that diversity of people and an environment of inclusion generate greater engagement, performance, and innovation. For a rich, open corporate culture, in line with the world around us, we recognize and respect the uniqueness of each individual. Saint-Gobain works to create an environment that fosters fairness and equality.

All Saint-Gobain collaborators are entitled to respectful treatment at the workplace and to be free from the harmful effects of harassment or unwelcome, offensive or improper conduct.

While Saint-Gobain respects individuals' freedom of expression, no Saint-Gobain collaborator shall be subjected to harassment or retaliation based on - including but not limited to - race, sex, national origin, religion, political opinion, age, medical status, disability, marital status, pregnancy, sexual orientation, gender identity or expression.

It is Saint-Gobain's policy to prohibit harassment in the workplace, against collaborators, whether fixed term or permanent, sub-contractors, clients or anyone interacting with a Saint-Gobain collaborator.

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HARASSMENT AND SEXUAL HARASSMENT

Harassment is defined as any offensive, inappropriate, unwelcome or even inadvertent behavior:

- that has the effect of hurting, offending, or upsetting another collaborator,
- that sets up a collaborator to make a mistake,
- that humiliates or intimidates a collaborator (“bullying”), or
- that entails physical or social isolation (“silent treatment”) of a collaborator.

Either a repeated or a one-off incident of egregious behavior can constitute harassment if this behavior is detrimental and results in adverse effects for the collaborator. Several successive acts which, taken in isolation seem insignificant, can constitute facts of harassment.

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person’s employment, as well as situations which create an environment which is hostile, intimidating or humiliating.

Sexual harassment may result from one or more incidents, and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behavior which constitute sexual harassment can include, but are not limited to:

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching

- Physical violence, including sexual assault
- Sexually-suggestive gestures
- The use of job-related threats or rewards to solicit sexual favors
- Comments on a worker’s appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Whistling, leering
- Sexual advances
- Display of sexually explicit or suggestive material
- Sending sexually explicit messages
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending remarks

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. Saint-Gobain recognizes that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

All harassment is prohibited whether it takes place within Saint-Gobain premises or outside, including at social events, business trips, training sessions or conferences, or through online activity such as social media.

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RESPONSIBILITIES

Anyone, including collaborators of Saint-Gobain, clients, customers, casual workers, contractors or visitors who harasses another will be reprimanded in accordance with this internal policy.

Collaborators are encouraged to advise others of behavior that is unwelcome or offensive. Sometimes, some behaviors are not intentional. While this does not make it acceptable, advising the offender of inappropriate behavior gives the offender the opportunity to modify or stop their offensive behavior.

Managers, at all levels, must ensure to provide a safe working environment

to their team members. This should be achieved by:

- ensuring that all their team members are aware of the policy,
- putting an end to any harassment they are aware of, whether there is a complaint or not,
- reporting immediately to Human Resources when made aware of conduct inconsistent with this Policy,
- ensuring their team members are not retaliated against for a prior complaint.

Any person who believes that they have witnessed a violation of this Policy, or who becomes aware of a conduct that may violate this Policy, should immediately report it.

SANCTIONS AND DISCIPLINARY MEASURES

Anyone who has been found to have harassed or sexually harassed another person under the terms of this policy is liable to a sanction. The nature of the sanctions will depend on the gravity and extent of the harassment.

Any collaborator who knew about the harassment but took no action to report it may also be subject to disciplinary sanctions, up to and including termination.

Any manager who fails to take corrective action with respect to conduct in violation of this policy, may be subject to disciplinary action up to and including termination of employment.

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REPORTING MECHANISMS

If a collaborator believes that they are being harassed they should seek support through one of the three means suggested below. Collaborators may choose the one they find most suitable to their specific situation: reporting to Management, reporting to HR or reporting through the alert system. **(SpeakUp @Saint-Gobain)**



Saint-Gobain strictly prohibits retaliation against anyone who, in good faith, reports violations of this Policy or participates in an investigation, even if the investigation does not ultimately prove the allegations. Dishonest, bad faith, or otherwise abusive reports (such as unfounded personal attacks aimed at harming specific individuals) are prohibited and may result in disciplinary action.

GOVERNANCE OF THE POLICY

Claire Pedini, the Senior vice-president, Human Resources and Corporate Social Responsibility oversees the policy within the Group.

Each Country CEO is responsible for ensuring compliance with and promotion of this policy and the Principles of Conduct and Action in the country/countries under his/her responsibility.

The Human Resources teams are responsible for deploying and implementing the policy at all Group sites.

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APPENDIX: DEALING WITH A SEXUAL OR MORAL HARASSMENT COMPLAINT

When a person (HR or Alert Examiner) receives a complaint of sexual or moral harassment, they will:

1. Firstly, assess if any initial steps are needed to ensure the safety of the alleged victim or others.
2. Immediately record the dates, times and facts of the incident(s).
3. Confidentiality is maintained to the greatest extent possible, while still permitting for a full and thorough investigation.
4. Ensure that the alleged victim understands the Group's policies and procedures for dealing with the complaint.
5. Ascertain the views of the alleged victim including their desired outcome.
6. Discuss and agree the next steps:
 - a. It can happen that, in case of minor and isolated incident, the alleged victim simply needs help to ask the alleged harasser to stop the behavior and explain the effect of such behavior on the alleged victim

(a role like a mediator). This can be the path only if the alleged victim feels safe and comfortable taking this action. In this case, it is documented and kept by the Ethics and Compliance Officer if it has been reported through compliance channels.

b. If this is not a minor isolated incident or if the victim is not comfortable with initiating such dialogue, a proper investigation shall be conducted.

7. Keep a confidential record of all discussions.
8. Ensure that the victim knows that choosing to resolve the matter internally does not exclude the possibility of filing a formal complaint (e.g., with the police).

If it is decided to conduct an internal investigation, the HR or the Alert Examiner should follow the procedure described in the Group investigations practice guide.

