



FOREST POLICY

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| Version | 1 |
| Purpose of the policy | Adopt a definition of deforestation and establish rules for purchasing raw materials likely to have an impact on forests |
| Scope of application | All entities |
| Under the supervision of | Senior Vice President, Human Resources and Corporate Social Responsibility |
| Confidentiality status | Public document, available in the resources center of Saint-Gobain website and on the intranet |
| Local adaptation | Not possible |
| Document owner | Corporate Social Responsibility department |
| Reviewed by | Sustainable Development Director, Responsible Purchasing Director, Group timber <i>expert</i> |
| Approved by | Senior Vice President, Human Resources and Corporate Social Responsibility, Corporate Secretary |

Forests are essential to our planet: they provide livelihoods, particularly for local communities, host the richest terrestrial biodiversity, and play a major role in fighting climate change. Deforestation is therefore a key factor in biodiversity loss and climate change. It also contributes to the weakening of indigenous peoples and local communities who depend on forest ecosystems to meet their needs. Fighting deforestation and forest degradation thus addresses a threefold challenge: ensuring the human rights of indigenous peoples and local communities, protecting biodiversity, and preserving the climate. We are a player in the wood sector, which is why we are committed to acting ethically and responsibly throughout the value chain and contributing to the preservation of forests, the local populations living in them, and the biodiversity they harbor.

APPROACH

To contribute to the preservation of forest ecosystems, Saint-Gobain identifies its impacts on forests and deforestation risks, adopts an international definition of deforestation and defines, in its Forest Policy, the principles of sustainable forest management. The Forest Policy applies to all consolidated entities of the Group. It pays particular attention to raw material supply chains likely to have an impact on forests.

The Forest Policy is based on the Principles of Conduct and Action, the Group's core values that constitute its Code of Ethics and define its vision of a responsible company, and on the Group's Responsible Purchasing and Human Rights Policies. It is aligned with Saint-Gobain's corporate purpose 'Making the world a better home'. The Policy is also based on international conventions.

To qualify deforestation, Saint-Gobain has chosen to apply the widely recognized definition provided by the Accountability Framework Initiative¹ (AFI). Thus, deforestation is defined as the loss of natural forest as a result of (i) conversion to agriculture or other non-forest land use; (ii) conversion to a tree plantation; or (iii) severe and sustained degradation.

The condition of forests is fixed as of December 31, 2020, a date commonly chosen as a reference for regulations, international conventions or certifications by independent bodies. Supplies must not originate from plots that have been converted or degraded, as per the above definition of deforestation, after December 31, 2020.

IMPLEMENTATION

The Forest Policy is based on a due diligence approach. This due diligence involves identifying:

- the raw materials likely to have an impact on forests ;
- their countries of origin ;
- the complexity of their value chains.

It also requires investigating whether the forest ecosystems from which our supplies originate are managed in accordance with the principles of our Policy. The due diligence methodology is regularly reviewed and updated.

¹ Accountability Framework Initiative: coalition of various organizations working to protect forests, natural ecosystems and human rights through ethical production and trade. <https://accountability-framework.org/>

Depending on the risk, in order to ensure the compliance of the forest ecosystems from which our supplies originate, we rely on recognized certifications such as FSC² and PEFC³. Other certifications compliant with the AFI definition may be accepted subject to approval in accordance with the responsibilities defined in the Governance section of this Policy.

As per the AFI definition, deforestation associated with a given geographic area or supply chain is measured and/or managed from the cutoff date, set as indicated above on December 31, 2020.

The supplier must provide evidence demonstrating compliance with the Forest Policy, and in particular with the threefold challenge of fighting deforestation and forest degradation set out in the introduction to this Policy: ensuring the human rights of indigenous peoples and local communities, protecting biodiversity, and preserving the climate.

If a supply originates from one or more plots that have been converted after December 31, 2020 or from plots that contribute to severe and prolonged degradation of natural forests, it will be considered as non-compliant with the Group's no-deforestation commitments.

In the event of material non-compliance, Saint-Gobain will apply the de-referencing procedure of its Responsible Purchasing Policy: period of dialogue to establish corrective measures, verification of compliance with the conformity program, maintenance or exclusion of the supplier from the referencing panel. These provisions are included in the contract clauses.

MANAGEMENT OF WOOD, PAPER AND WOOD PULP SUPPLY CHAINS

The Group's main deforestation risks relate to our sourcing of wood, paper, and wood pulp. Managing these risks requires specific measures which are described in dedicated policies: the Timber Policy and the wood Pulp Policy.

RECYCLED MATERIALS, CO-PRODUCTS, BY-PRODUCTS, AND WOOD WASTE

In order to help reduce the pressure on natural forests, when possible, we aim to prioritize recycled materials, co-products, by-products, and wood waste as a substitute for virgin material. In such cases, we initiate a dialogue with suppliers and the supply chain on the traceability of materials to prevent the purchase of materials linked to deforestation.

² FSC: Forest Stewardship Council®, the mark of responsible forest management. The FSC® label signifies that the wood used in the manufacture of the product comes from a responsibly managed forest that meets strict environmental, social, and economic standards. <https://fsc.org/en> © 1996 Forest Stewardship Council A.C.

³ PEFC: Program for the Endorsement of Forest Certification schemes. The PEFC label signifies that the wood used in the product's manufacture comes from sustainably managed forests and controlled sources. www.pefc.org

EFFICIENCY MONITORING

As part of monitoring the implementation of the Forest Policy, indicators are established and regularly tracked to measure compliance with our commitments, assess progress made, and identify areas for improvement.

In the drive to restore forests, we encourage our suppliers to contribute actively and propose collaborative initiatives aimed at promoting sustainability objectives and sustainable forest management.

GOVERNANCE AND STAKEHOLDER DIALOGUE

The Senior Vice-President, Human Resources and Corporate Social Responsibility oversees the Policy within the Group.

The Purchasing Department, and in particular the Responsible Purchasing Department, disseminates the Policy and ensures the monitoring and implementation of the due diligence during the purchasing process and in the relationship with suppliers.

Each Country CEO is responsible for ensuring promotion of and compliance with this Policy in the country/countries under their responsibility.

In implementing the Forest Policy, the Corporate Social Responsibility team ensures that the positions of its relevant stakeholders potentially impacted by our purchases presenting a risk of deforestation are taken into account.

Our suppliers are our key partners in developing responsible supply chains. They must commit to adhering to the Policy alongside us and are required to report any irregularities that may impact any aspect of the Policy.

Saint-Gobain has an ethical and professional whistleblowing system that is accessible to employees and all other stakeholders (clients, suppliers, suppliers' employees, shareholders, trade unions, NGOs, local communities, etc.) to report any breaches of applicable regulations or internal rules and procedures, in particular those related to the Code of Ethics. Information related to this system is available on the Group's website.

Saint-Gobain is responsive to non-governmental organizations involved in the fight against deforestation.

As part of a continuous improvement process, Saint-Gobain is committed to open dialogue with relevant stakeholders potentially impacted by its purchases presenting a risk of deforestation.

Saint-Gobain is committed to regularly and transparently communicating its progress and challenges.

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