



ETHICS & COMPLIANCE

# **SPEAKUP ! ALERT POLICY**

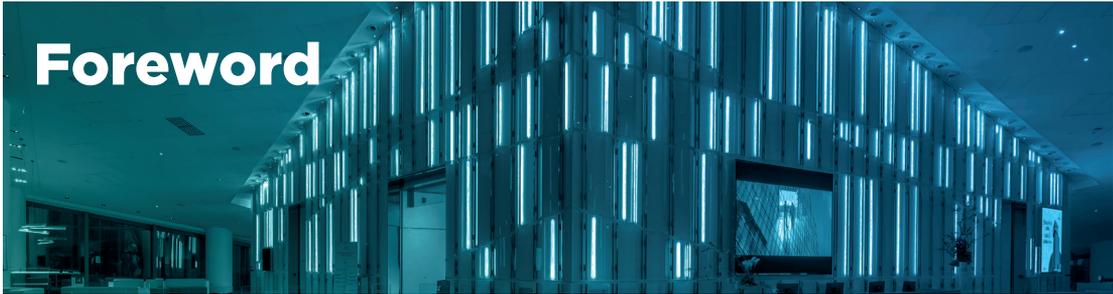


## SpeakUp! alert policy

<b>Version</b>	Version 3, October 2024
<b>First version</b>	April 2012
<b>Number of pages</b>	13
<b>Name of policy</b>	SpeakUp! alert policy
<b>Aims of policy</b>	Explain how to report breaches and describe the main steps involved in processing reports
<b>Related documents</b>	Principles of Conduct and Action Alert Examiner and investigator guide SpeakUp! communication kit Information notice on personal data
<b>Target audience</b>	All employees of exclusively or jointly controlled Group companies or joint ventures, as well as third parties to the Group.
<b>Local adaptation</b>	This Alert Policy may be adapted locally to take account of specific local circumstances, without however undermining the protection of whistleblowers and the persons mentioned in the alert.
<b>Languages</b>	English and French Local versions and other languages available here : <a href="#">E&amp;C in the Regions</a>
<b>Level of confidentiality</b>	Public document, available in the resources center on <a href="http://www.saint-gobain.com">www.saint-gobain.com</a> and on the <a href="#">l'intranet</a>
<b>Document owner</b>	Ethics and compliance department
<b>Reviewed by</b>	CSR Director, Group DPO
<b>Approved by</b>	Claire Pedini, Senior VP, Human Resources

# TABLE OF CONTENTS

<b>I. REPORTING AN INCIDENT</b>	<b>05</b>
1. What types of breaches can be reported?	<b>05</b>
2. How to report an incident?	<b>07</b>
3. What information to provide in a report?	<b>08</b>
<b>II. ALERT PROCESSING</b>	<b>09</b>
1. What are the admissibility criteria for an alert?	<b>09</b>
2. What is the role of the Alert Examiner?	<b>10</b>
3. How are alerts processed?	<b>10</b>
4. What action is taken in response to alerts?	<b>11</b>
<b>III. INDIVIDUAL RIGHTS AND DUTIES</b>	<b>12</b>
1. Confidentiality	<b>12</b>
2. Informing people	<b>12</b>
3. Whistleblower protection	<b>13</b>
4. Responsibilities of interviewees	<b>13</b>
5. Data retention	<b>13</b>
<b>IV. ROLES AND RESPONSABILITIES</b>	<b>14</b>



The Alert Policy is anchored in the Principles of Conduct and Action, which apply to all Saint-Gobain employees and managers.

It meets the international commitments made by the Group<sup>1</sup>, and obligations under French law, in particular the Sapin II<sup>2</sup> law.

## I. REPORTING AN INCIDENT

All Group **employees** (staff on permanent or part-time contracts, apprentices, interns, temporary workers...) as well as suppliers, subcontractors, customers or other **stakeholders** connected with Saint-Gobain have access to the SpeakUp! Alert system via the Group's website<sup>3</sup>.

### 1/ What types of breaches can be reported



**Breaches** that may be reported are acts or behavior that contravene applicable laws and regulations, as well as the Principles of Conduct and Action.

These breaches may be committed by employees, trainees, temporary staff or service providers working for Saint-Gobain, as well as by subcontractors in the context of their business relationship with the Group.

1. United Nations Human Rights Charter, United Nations Anti-Bribery Convention, the ten principles of the Global Compact and the Organisation for Economic Co-operation and Development ('OECD') Guidelines for Multinational Enterprises.
2. Law no. 2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of economic life, as amended by Law no. 2022-401 of March 21, 2022 on the protection of whistleblowers..
3. <https://www.saint-gobain.com/en/corporate-responsibility/our-pillars/business-ethics>

Alerts are classified into four main categories of non-compliance in the following areas:

- **Corruption, fraud and conflicts of interest:**
  - Corruption and influence peddling
  - Theft, embezzlement, money laundering and other breaches of financial probity (including irregularities in financial statements)
  - Conflicts of interest
  
- **Discrimination, harassment and human rights violations:**
  - Failure to respect freedom of association
  - Use of forced or child labor
  - Discrimination, moral or sexual harassment, violent behavior
  - Non-compliance with labor laws
  - Failure to protect personal data
  
- **Environment, health and safety:**
  - Environmental damage
  - Damage to health and safety
  
- **Other breaches:**
  - Anti-competitive practices
  - Non-compliance with export controls, economic sanctions and embargoes
  - Non-conformity of products, systems or services sold by the Group
  - Other

This list is not exhaustive, and these areas are likely to evolve over time.

## 2/ How to report an incident?

People wishing to report wrongdoing can contact their manager, their HR manager, the Alert Examiner<sup>4</sup> or use the SpeakUp! platform or a dedicated telephone line, with the option of remaining anonymous in the latter two cases.

**Caution!** In the event of an **emergency** (such as an immediate threat to life or property), contact the manager or the appropriate emergency services immediately.

### A. Online platform:



SpeakUp! is an online platform specifically designed to collect anonymous and non-anonymous reports. It is available in over 30 languages and can be accessed here: <https://www.bkms-system.net/saint-gobain>.

This system is highly secure: only the alert Examiners for the country or perimeter concerned will have access to the content.



When a report is made anonymously, the author of the report has access to an anonymous messaging system included in the platform. All interactions and exchanges of information take place on this platform, without access to the identity of the author.

### B. Dedicated hotlines:

In some countries where the Group operates, a dedicated hotline is available to employees and third parties for anonymous or non-anonymous reporting. Phone numbers and access conditions are detailed in **appendix 1 and on the Group intranet**.

4. The list of Examiners is available on the intranet. Alert coordinators receive and handle alerts for their country or area, in compliance with the Alert Examiner Charter in appendix 3

### B. Other means:

Whistleblowers may report directly in writing by any means, or verbally. In this case, the person who receives the report must ensure the strictest confidentiality and suggest that the whistleblower use the **SpeakUp** !<sup>5</sup> platform.



When the person requests to report by videoconference or physical meeting, the interview must be arranged no later than twenty working days after receipt of the request for an appointment.



Regardless of the channel chosen for reporting, an acknowledgement of receipt must be sent in writing to the author of the report no later than 7 working days after the report is received.

### B. Facilitators:

Whistleblowers can enlist the help of any natural or legal person (NGO, trade union or association) to help them report a case. This person, known as a “facilitator”, enjoys the same protection as the whistleblower.

## 3/ What information to provide in a report?

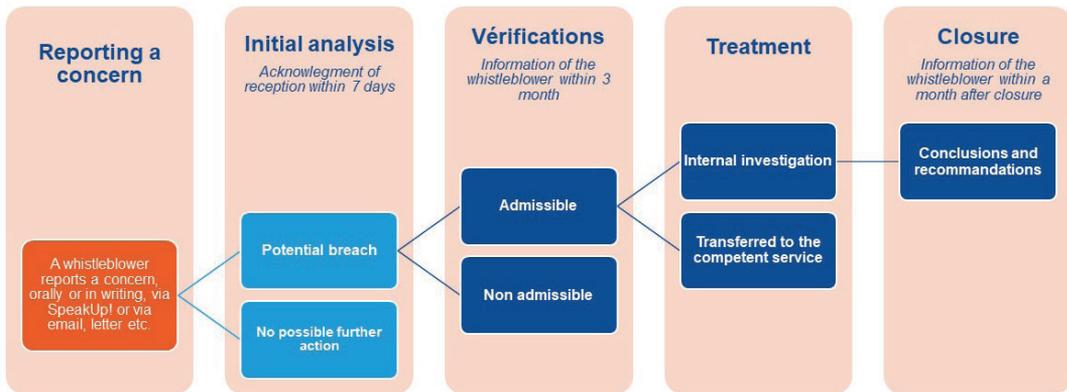
The person making the report must give a precise description of the facts, dates or periods concerned, if they have personal knowledge of them, and of the circumstances, so that the report can be processed. They may submit documents in support of the report.

No disciplinary or retaliatory action will be taken against the author of a report if the report, made in good faith, subsequently proves to be erroneous or unfounded.

**Caution!** The author of the alert must not divulge any information covered by the secrecy of national defense, the medical secrecy of a third party, the secrecy of judicial deliberations, the secrecy of the investigation or judicial inquiry, or the professional secrecy of a lawyer.

## II. ALERT PROCESSING

The main steps in alert processing are the following:



### 1/ What are the admissibility criteria for an alert?

Alerts are declared admissible when:

- the actions concern a breach<sup>6</sup> of the present Alert Policy, and
- the person making the report is acting in without direct financial consideration and in good faith<sup>7</sup>.

When the facts occur outside professional activities, the whistleblower must have personal knowledge of them to benefit from whistleblower protection.

On receipt of a report, the Alert Examiner carries out a preliminary analysis to determine whether the report constitutes an admissible alert. If they are unable to make a decision, they may request further information from the author of the alert and call on the services of competent professionals to make this assessment.

Only admissible alerts may be investigated internally, or forwarded to the relevant department for processing when no internal investigation is required.

>> If the alert is ineligible, the author of the alert is informed in writing

6. C.f. I.1) what types of breaches can be reported?
7. A person is considered to be acting in good faith if they have reasonable grounds for believing that the facts reported are true in the light of the information available to them.

## SPEAKUP ! ALERTE POLICY

and, if necessary, referred to the appropriate people who can help. The Alert Examiner will then close the alert.

>> If the report is admissible, the Examiner informs the whistleblower in writing, within a maximum of 3 months from acknowledgement of receipt of the report, of the measures planned or taken to verify the accuracy of the allegation.

### **2/ What is the role of the Alert Examiner<sup>8</sup> ?**

Alert Examiners are authorized to communicate with whistleblowers. They have the skills to carry out their task of identifying potential breaches and conducting an internal investigation in a confidential, professional and impartial manner.

The Alert Examiners network can be made up of:

- Ethics and Compliance Officers in the regions, clusters, countries and activities;
- Ad Hoc alert examiners with a specialization in HR, EHS, audit, internal control or fraud, for example.

By signing the Alert Examiner charter<sup>9</sup>, each Alert Examiner commits to strict confidentiality, impartiality, transparency and loyalty.

### **3/ How are alerts processed?**

When an internal investigation is launched, its purpose is to determine whether the facts revealed by the alert are true, the conclusions to be drawn and any recommendations for further action.

Admissible alerts are handled according to the following principles:

- the Alert Examiner may set up an investigation team (Group employees and/or external experts), depending on the skills required, to analyze the facts reported by the whistleblower.

8. Examiner names and contact details are available here : [EC\\_List\\_of\\_Alert\\_Referents\\_EN.pdf](#).

9. C.f. Appendix 3.

- the Alert Examiner is empowered to consult any internal documents they deem useful in examining the facts, and to call on any persons likely to shed light on the matter. They will endeavor to collect only data that is relevant and strictly necessary to the investigation (principles of relevance and minimization). They inform those contacted of the confidential nature of the request.
- when the Alert Examiner considers that enough information has been gathered, they shall submit their conclusions to management, close the case and inform the whistleblower of the closure of the investigation..

**Caution!** Apart from the designated investigation team, no one has the right to be informed, to interfere with an investigation or to gather evidence or documents relating to the alert without having been empowered to do so.

#### **4/ What action is taken in response to alerts?**

On completion of the investigation, the Alert Examiner forwards their findings and recommendations to the appropriate level of management for action.

Follow-up action may include:

- an action plan (for example, launching an audit, modifying a process, reorganizing a department, setting up training courses);
- disciplinary sanctions;
- civil proceedings;
- or even the lodging of a complaint.

### III. INDIVIDUAL RIGHTS AND DUTIES

#### 1/ Confidentiality

The principle of confidentiality is the cornerstone of the whistleblowing system. Confidentiality manifests itself in several ways within the system:

- Alert Examiners commit to confidentiality by signing the Alert Examiner Charter;
- those interviewed and consulted undertake to maintain the strictest confidentiality regarding the alert and the content of exchanges;
- the Group undertakes to respect the confidentiality of the personal data of the parties concerned (i.e. the whistleblower and the persons mentioned or implicated in the alert);
- the whistleblower's identity and identifying details may only be disclosed with their consent and may only be accessed by those involved in the management of the case. Any unauthorized disclosure may result in disciplinary action..

#### 2/ Informing people

Persons mentioned in an alert or investigation have the right to know the reasons for it. Depending on the needs of the investigation, they may be informed of its progress.

The Group also undertakes to inform the persons implicated and mentioned in the alert of the applicable regulations on the protection of personal data, as detailed in the Information Notice<sup>10</sup>. Depending on the context, this information may be provided at the start of the survey (if applicable) or at a later date.

10. Details of how to exercise your personal data protection rights are given in the Information Notice.

### 3/ Whistleblower protection

No disciplinary action, legal proceedings or other retaliatory measure may be taken against the whistleblower or any person who assisted the whistleblower in filing their report (“facilitator”), if they are acting in good faith, even if the facts reported are not confirmed at the end of the investigation or if the report is closed without further action.



Whistleblower protection will be suspended if the investigation subsequently reveals that they acted in bad faith.

### 4/ Responsibilities of interviewees

In application of the Principles of Conduct and Action, and in particular the Principles of Loyalty and Integrity, all employees involved in an investigation must cooperate (e.g. provide requested documents, not destroy documents or collude with a witness) and answer questions honestly.

### 5/ Data retention

The protection of individuals and their personal data is central to the Alert Examiners’ commitments. The alert management process described in this Alert Policy, and the dedicated SpeakUp! information system used to track them, have been designed to ensure that data is not used for any purpose other than alert management, and is kept securely for the time strictly necessary for processing, without excess. Only information strictly necessary for alert management is collected and processed.

## SPEAKUP ! ALERTE POLICY

Alert	Data retention
Ineligible alert	Anonymization in the quarter following analysis of admissibility.
Admissible alert - being processed	Kept in active base until final decision on further action.
Admissible alert processed and closed with no further action taken	Anonymization in the quarter following final decision on follow-up.
Admissible alert processed and closed, leading to further action	Retention of data until the end of the procedure or the time limit for appeals against the decision.

The personal data processed in the context of alerts is subject to an archiving policy detailed in the [Information Notice](#).

### IV. ROLES AND RESPONSIBILITIES

This Alert Policy and its updates are the responsibility of the Ethics and Compliance department.

The role of the Ethics and Compliance Officers in each Region, Country, Cluster or activity is to:

- where necessary, adapt the Policy to take account of local specificities, without however undermining the protection of whistleblowers and the persons mentioned in the alert, and translate it into the chosen languages.
- ensure that this Whistleblowing Policy is disseminated to all entities within its scope.
- ensure that a “Communication Kit” is made available to Human Resources and Managers.
- advise anyone with questions about the Alert Policy..

Managers are responsible for ensuring that their teams’ employees are aware of this Alert Policy.

# Appendix

## APPENDIX 1 : Hotlines

Country	Phone number	Languages	Type of service
Angola	+244226425575	Portuguese and English	SpeakUp! voice mail Code 4558
Botswana	00-267-800-786-1099	English and Setswana	SpeakUp! voice mail Code 4558
Ivory Coast	+2252721340766	French and English	SpeakUp! voice mail Code 4558
Ghana	+233596992705	English	SpeakUp! voice mail Code 4558
Kenya	+254203894200	English and Swahili	SpeakUp! voice mail Code 4558
Mauritius	+23052970985	French and English	SpeakUp! voice mail Code 4558
Europe	+33187212291	English, French, German, Polish and Spanish	SpeakUp! voice mail Code 4558
USA	+12132791015	English, French, Spanish, Arabic and Russian	SpeakUp! voice mail Code 4558
Canada	+12894019198	English, French, Spanish, Arabic and Russian	SpeakUp! voice mail Code 4558
UK	0844 847 6649	Anglais	Collection of alerts by authorized personnel
Mexico	+5255 54150773	Spanish	Voice mail
Colombia	+5255 54150773	Spanish	Voice mail
Ecuador	+5255 54150773	Spanish	Voice mail
Brazil	0800 792 1018	Portuguese	Voice mail

## ***APPENDIX 2 : Non-retaliation procedure***

During the investigation and after its closure, a whistleblower, facilitator or any other person involved in the investigation who feels or fears reprisals may report the situation via the alert system or directly by informing the Alert Examiner.

Where the risk of reprisals is confirmed, specific protective measures may be proposed by the Alert Examiner, in conjunction with the relevant human resources department, for example:

- temporary or permanent reassignment (e.g. working from home);
- a change in line management;
- engagement with HR to monitor the workplace situation.

Employees who take reprisals or have taken reprisals may be subject to disciplinary measures, up to and including dismissal.

## ***APPENDIX 3 : Alert Examiner charter***

Saint-Gobain has set up an ethical and professional alert system open to all employees and stakeholders (customers, suppliers, shareholders, trade unions, NGOs, local authorities, the State, etc.).

The effectiveness of this system relies on the network of Alert Examiners, who are responsible for the proper handling of alerts. As such, the Alert Examiner is responsible for:

- collecting and recording alerts in the dedicated system;
- fact-finding, data analysis and interviewing;
- communicating with the persons concerned by the alert;
- issuing conclusions and recommendations for action;
- documenting the entire follow-up process in [SpeakUp!](#).

As part of its mission, the Alert Examiner is required to comply with the Principles of Conduct and Action and hereby undertakes to respect

the following additional obligations:

- ensure that measures are taken to protect people and the Group.
- respect the principles of confidentiality, discernment, impartiality and objectivity, proportionality and minimization of the data collected, as well as transparency and fairness towards the people whose data is processed.
- keep the whistleblower's identity strictly confidential.
- only disclose information about the persons concerned (who are presumed not to be at fault until the conclusion of the investigation) and the content of the alert to those who need to know.
- not be in a situation of conflict of interest or be at risk of being in such a situation; if this is not the case, they must immediately withdraw from the handling of the alert and inform the Ethics and Compliance Department.

The Alert Examiner is responsible for ensuring compliance with these principles by any person (internal or external to the Group) to whom they delegate all or part of their Alert Examiner duties, or whose assistance they request; they ensure that this person is not, or is not likely to be, in a situation of conflict of interest. This person must also sign the present Charter.

These obligations are a prerequisite for the proper functioning of the Group's whistle-blowing system. Any breach may give rise to disciplinary or legal proceedings..

#### ***APPENDIX 4 - France : authorities responsible for receiving reports***

The list of authorities competent to receive alerts is detailed in the appendix to Decree no. 2022-1284 of October 3, 2022 on the procedures for receiving and processing alerts issued by whistleblowers and establishing the list of external authorities instituted by Law no. 2022-401 of March 21, 2022 aimed at improving the protection of whistleblowers and accessible via the following link : [https://www.legifrance.gouv.fr/loda/article\\_lc/LEGIARTI000046357809/2023-01-06](https://www.legifrance.gouv.fr/loda/article_lc/LEGIARTI000046357809/2023-01-06)

