

HUMAN RIGHTS POLICY

February 2019

Saint-Gobain's human rights policy is based on our Principles of Conduct and Action, which set out the Group's core values defining our vision of a socially responsible company.

The Principles of Conduct and Action are the Group's code of ethics applicable to all employees and shared with our partners: subcontractors, suppliers, customers and other stakeholders.

Through these Principles, we are committed to respecting human rights in accordance with international standards and to taking the necessary measures to identify and manage existing or potential negative impacts related to our operations or value chain.

OUR APPROACH

We are signatories of the United Nations Global Compact. Our Principles of Conduct and Action explicitly refer to the relevant International Labour Organisation conventions, the OECD Guidelines for Multinational Enterprises, the OECD Anti-Bribery Convention and the International Bill of Human Rights. We have committed to respecting the United Nations' Guiding Principles on Business and Human Rights.

Our Principles of Action in particular make direct reference to them: respect for the law, caring for the environment and respect for employees' rights.

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

The implementation of these commitments is based on our Principles of Conduct, both individual and collective, which form the second and complementary set of our values: respect for people, integrity, loyalty and solidarity.

Human rights due diligence through the identification of risks related directly or indirectly to our operations, allows for the most appropriate management of potential or existing negative impacts depending on the countries where we are present or where our partners are present.

We are aware that human rights risk assessment cannot be frozen in time and that the effective management of potential negative impacts requires a constant and transparent dialogue with the stakeholders involved.

“ON-BOARDING” HUMAN RIGHTS

We have identified key human rights areas of application, which are listed below. These areas represent potential risks of problem areas.

The risks of problem areas identified during the due diligence process relate to:

- ▶ **Employees’ rights :**
 - Forced labour
 - Child labour
 - Freedom of association
 - Use of recruitment agencies
 - Non-Discrimination

- ▶ **Health and safety**

- ▶ **The environment**

- ▶ **The fight against corruption.**

In some countries, where the safety of individuals is an ongoing concern, the risks associated with the use of armed security forces are also taken into account.

Risks related to health and safety, the environment and the fight against corruption are addressed through specific policies.

All these risks of problem areas are taken into account in the Principles of Conduct and Action. The EHS and responsible development departments have accordingly set up training programs for our employees to ensure that everyone understands them and that they are effectively implemented by those responsible for managing the relevant operations. Some of these programs may be open to partners, particularly suppliers and subcontractors who have signed the Responsible Purchasing Charter.

GOVERNANCE AND STAKEHOLDER DIALOGUE

This policy is presented by the Chairman and Chief Executive Officer to the Board of Directors. It is based on a principle of due diligence, which involves a methodology itself subject to a process of continuous improvement. It is therefore subject to revision from time to time as necessary.

The General Secretary, in charge of Corporate Social Responsibility, oversees the respect of human rights within the Group.



Each Country CEO is responsible for ensuring compliance with and promotion of the Principles of Conduct and Action in the country/countries under his/her responsibility. He/she is also in charge of implementing the human rights policy for our activities and local partners.

The measures implemented within the framework of Responsible Purchasing take into account human rights risks. The Group's Purchasing Department is responsible for their implementation.

A professional alert system is in place to collect reports of negative impacts. A specific policy on the management of such alerts has been published.

We are committed to training our most exposed employees and managers in the identification and management of risk situations in an open dialogue with potentially impacted stakeholders.

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