



SAINT-GOBAIN UK  
**MODERN SLAVERY STATEMENT 2018**

Financial year end 31<sup>st</sup> December 2018



Saint-Gobain UK is committed to working with others to take steps to eradicate modern slavery in our supply chain. Construction has the second highest rate of modern slavery and we have a duty to play our part in helping to address this.

I am delighted that we have now trained more than 280 staff to recognise the signs of modern slavery and to share details of our activities in this area in 2018.

This statement was put before the board and approved on the 26<sup>th</sup> June 2019.



**Mike Chaldecott,**  
CEO Saint-Gobain UK and Ireland

## OUR LEGAL ENTITIES

---

- Saint-Gobain Limited
- Artex Limited
- Saint-Gobain Construction Products UK Limited
- BPB Limited
- Jewson Limited
- Saint-Gobain Building Distribution Limited
- Saint-Gobain High Performance Solutions UK Limited
- Saint-Gobain Glass (United Kingdom) Limited
- Saint-Gobain Performance Plastics Rencol Limited
- Vetrotech Saint-Gobain International AG
- Leca Danmark A/S
- Saint-Gobain Isover UK Limited
- Scotframe Timber Engineering Limited
- Val-U-Therm Limited
- Kaimann UK Limited
- Farècla Products Limited
- Saint-Gobain Roofspace Limited
- Roofspace Solutions Limited
- Pritex Limited

# 01/ INTRODUCTION

This statement details the policies and procedures in place and the actions to reduce the risk of modern slavery and human trafficking within our supply chains and our businesses. This document is published in accordance with the Modern Slavery Act 2015 and relates to the year ending December 2018.

## ABOUT SAINT-GOBAIN

Saint-Gobain designs, manufactures and distributes materials and solutions which are key ingredients in the well-being of each of us and the future of all. They can be found everywhere in our living places and our daily life: in buildings, transportation, infrastructure and many industrial applications. They provide comfort, performance and safety while addressing the challenges of sustainable construction, resource efficiency and climate change. The Group is present in 67 countries and employs more than 170,000 people.





**Construction has been recognised as a high-risk industry, second only to the sex industry, for several reasons:**

- High reliance on migrant labour
- Fragmented Supply Chain
- Escalating use of agency labour
- High proportion of low-skilled workers
- Lack of transparency
- Temporary projects
- Tight time constraints
- Price-driven culture
- Very low margins
- Procurement of materials with complex supply chains

## 02/ SAINT-GOBAIN VALUES AND COMMITMENTS

---

We have been a signatory to the UN Global Compact since 2003, committed to respect the ten principles including Principle 4: the elimination of all forms of forced and compulsory labour. These are aligned to the Group's Principles of Conduct and Action which are the Group's code of ethical conduct that explicitly include workers health, safety and employment rights. The Group's Principles of Conduct and Action specifically refer to, and are informed by, ILO conventions, in particular the convention on fundamental labour rights ensuring the promotion of fundamental values such as "abolishing forced or compulsory labour", OECD guidelines, and the

International Bill of Human Rights. Since 2009 we have been pursuing an extensive programme to educate and train our employees on the Principles of Conduct and Action and their centrality to the way we do business. These Principles are displayed to all of our employees. Adherence to these principles is a requirement for belonging to the Saint-Gobain Group. Each management level (Country or business, unit or country-led professional service) is responsible for ensuring that these principles are applied. A whistleblowing system is in place to allow employees and suppliers to report any violations of applicable laws, internal rules and procedures, and

the Principles of Conduct and Action. All reports are processed, investigated as applicable, and when justified, appropriate measures are taken. An annual report on incidents involving forced or mandatory labour is published and available in our Registration Document at **[www.saint-gobain.com/en/press/corporate-publications](http://www.saint-gobain.com/en/press/corporate-publications)**

## 02/ SAINT-GOBAIN VALUES AND COMMITMENTS

In addition, we established in 2017 a duty of vigilance plan integrating a global due diligence on human rights. The scope of the plan includes our activities all over the world, the contractors and the direct suppliers.

The plan is publicly disclosed and communicates the risk mapping, the action plans to mitigate the risks and an evaluation of the efficiency of the measures. Forced labour is a human right specifically identified to be taken into consideration in the purchasing processes to ensure the highest standards are applied to our supply chains.

In addition, in March 2019, Saint-Gobain disclosed its human rights policy. Forced labour is also identified as a specific risk to be managed.

In the UK we will continue to build upon this approach and involve HR and purchasing teams to undertake additional training on modern slavery with a specific focus on identification of issues and reacting to concerns, both within the organisation and in the supply chain.



In 2016

**40.3** million  
people were estimated to be  
victims of slavery worldwide

## 03/ THE SUPPLY CHAIN

Our supply chain in the UK is very broad with more than 25,000 first tier suppliers from 46 countries. To focus the management of this complex supply base this is sub-divided into two top level categories, specifically:

- Trade products - goods for resale in distribution businesses, these are managed by the category management teams within the distribution arm of our business.

- Non-trade products and services - raw materials/components used in the manufacture of finished products, office/engineering supplies, professional services, support services (e.g. cleaning, temporary labour, etc.) which are managed by the UK Procurement Professional Service Department.

In accordance with the Group process described on the first page of this document and the categories of supply described here, the businesses have procedures in place to identify, react to and minimise the risks present in the supply chain.

To complement its Responsible Purchasing policy, certain categories of purchases comprise specific environmental, social, human rights or legal risks. Having identified these risks, we have implemented a supplier assessment programme. This includes rolling out a tool through an online platform and for this to become a compulsory part of the purchasing process for suppliers operating in these particular areas. The results from online assessment audits are used to inform and focus the businesses follow up onsite audits.

# 03/ THE SUPPLY CHAIN CONTINUED

## STAGE 1

### KEY ACTIVITIES

Supplier acceptance of the Saint-Gobain Supplier Charter, which highlights the standards required from suppliers, to which acceptance is expected for each contract period.

## STAGE 2

### KEY ACTIVITIES

Assessment via an online audit which evaluates suppliers' corporate social responsibility credentials and systems.

## STAGE 3

### KEY ACTIVITIES

Supplier specific follow up and action plans are developed based upon the results of Stage 2.



At the same time, risk mapping is undertaken and the construction arm of our business performs systematic audits of supplier factories. The purpose of these factory audits is to assess the management systems in place and the environmental, social and ethical aspects of the production activities. After the audit the supplier receives a report as well as recommendations for compliance which includes an expected completion date or paths for improvement.

## 04/ AWARENESS TRAINING

Training is another key priority to help reduce the risk of modern slavery in its operations. During 2017 we developed an interactive, multi-media training program in order to raise awareness of the issue, help our staff to spot the risk indicators and inform them of the correct routes to report any concerns or risks they may identify. This training is compulsory for all HR and purchasing staff in the UK and to date over 280 employees (89%) have completed the module. In 2019 the focus of activities will be on increasing the knowledge of suppliers through promotion of external workshops.



More than  
**280**  
staff  
trained 

## 05/ TAKING THE LEAD

---

We are taking a lead role in the UK construction sector to address the issue of Modern Slavery, by working with Stronger Together as a sponsor on their "Preventing and tackling Modern Slavery in the Construction Sector" initiative. Stronger Together is a multi-stakeholder initiative. Their aim is to reduce forced labour, human trafficking and other hidden third party labour exploitation. They provide guidance and resources to help businesses reduce the risk of modern slavery in both their own operations and their supply chains. As part of this sponsorship we will be hosting industry specific training courses to raise awareness of the issue, with these

courses open to anyone within the construction sector, but specifically targeting our suppliers, customers and employees. In addition, our Head of Sustainable Procurement in the UK represents Saint-Gobain in the UK at the Construction Steering Group.

For further information on our approach and to view key figures on responsible purchasing published by Saint-Gobain Group please visit:

[www.saint-gobain.co.uk/csr](http://www.saint-gobain.co.uk/csr)