

MODERN SLAVERY STATEMENT 2022

Saint-Gobain UK



CONTENTS

INTRODUCTION	3
OUR BUSINESS AND SUPPLY CHAIN	4
POLICIES AND CONTROLS	6
COLLABORATION	7
RISK ASSESSMENT AND MANAGEMENT	8
GOVERNANCE	10
TRAINING	10

INTRODUCTION

This is the Saint-Gobain UK 2022 Modern Slavery Statement, published in accordance with the Modern Slavery Act 2015 and relating to the financial year ending 2022. This statement outlines the policies and procedures we have in place and the steps taken by Saint-Gobain in the UK to reduce the risk of modern slavery and human trafficking within our businesses and supply chains.

We recognise that the construction industry has one of the highest rates of modern slavery in the UK and are committed to playing our part in helping to address this through identifying risk within our business operations, implementing policies and procedures, and working with others to take steps to eradicate modern slavery in our supply chain.

This statement was put before the board of Saint-Gobain UK and Ireland and approved on the 20th June 2023.



Mike Chaldecott
CEO, Saint-Gobain UK and Ireland

OUR BUSINESS AND SUPPLY CHAIN

Saint-Gobain designs and manufactures materials and solutions for the construction, mobility, healthcare and other industrial application markets. Developed through a continuous innovation process, they can be found everywhere in our living places and daily life, providing wellbeing, performance and safety, while addressing the challenges of sustainable construction, resource efficiency and the fight against climate change.

This strategy of responsible growth is guided by the **Saint-Gobain Principles of Conduct and Action**, and in furtherance of Our Purpose - **Making the World a Better Home**, which responds to the shared ambition of everyone in the Group, to act every day to make the world a more beautiful and sustainable place to live.



MAKING THE WORLD A BETTER HOME



SIX PRIORITIES FOR ACTION TO GROW & IMPACT



Focus on high growth markets



Be solutions-oriented



Foster growth through client-centric innovation and the power of data



Embed CSR



Strengthen our Trust, Empowerment, Collaboration culture



Build a diverse and inclusive workplace

OUR LEGAL ENTITIES

- Artex Limited
- BPB Limited
- Calders and Grandidge (Boston) Limited
- Chryso UK Limited
- Farécla Products Limited
- GCP Applied Technologies (UK) Limited
- Leca Denmark A/S

- Norman limited (now divested)
- Pritex Limited
- R.I.W. Limited
- Saint-Gobain Building Distribution Limited (now divested)
- Saint-Gobain Construction Products UK Limited
- Saint-Gobain Glass (United Kingdom) Limited


- Saint-Gobain High Performance Solutions UK Limited
- Saint-Gobain Isover UK Limited
- Saint-Gobain Limited
- Saint-Gobain Performance Plastics Rencol Limited
- Vetrotech Saint-Gobain (International) AG

Purchasing is carried out at two different levels in our supply chain;

- 01 Direct manufacturing purchases e.g. raw materials and packaging
- 02 Indirect manufacturing purchases e.g. waste management

THE SAINT-GOBAIN GROUP OPERATES IN

 **75 countries** with over  **168,000 employees.**

Saint-Gobain in the UK and Ireland includes over 19 well-known and respected brands including; British Gypsum, Weber, Isover, Glassolutions, Saint-Gobain PAM and Ecophon. You can find a full list of our brands on our [website](#). We serve the construction sector, principally, but also the automotive, industrial, energy, agriculture and healthcare sectors through a large industrial and manufacturing network comprising of  **40 manufacturing sites** that produce high performing products and solutions

You can read more about our business on our [website](#) and in the **Saint-Gobain Universal Registration Document 2022.**

POLICIES AND CONTROLS

All purchasing activity across our extensive and global supply chain is based on a common framework; Saint-Gobain's Responsible Purchasing Policy, which aims to manage and reduce environmental, social and societal risks associated with our supply chains. It is a direct extension of our code of ethics, **the Principles of Conduct and Action**, and is built around two pillars; **the Purchasers Charter** and **the Suppliers Charter**.

POLICIES

We abide by a number of policies in all purchasing activity;

- **Human rights policy**
- **Anti-Corruption Policy**
- **UK Whistleblowing policy**
- **Tackling Modern Slavery Policy**

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.

COLLABORATION



tackling modern slavery in supply chains

We are a sponsor of the **Stronger Together Construction Programme** which supports businesses in the construction industry to tackle modern slavery. Through the programme, businesses across the construction supply chain are supported in taking actions to mitigate modern slavery within their own operations, and with their sub-contractors and suppliers. The programme provides a safe platform and support network for sharing challenges and good practice with peers and experts.

As Project Sponsors we benefit from the professional guidance of Stronger Together as well as their support in evolving our approach to tackling modern slavery. We are allocated free spaces on Stronger Together training workshops, as well as practical tools and resources to equip our colleagues and suppliers with best practices on how modern slavery and forced labour can be recognised and eliminated in the UK construction industry.



We are delighted to continue our collaboration with Saint-Gobain, as one of the Founding Sponsors of our Construction Programme. We welcome Saint-Gobain's commitment to raising awareness and engaging suppliers on the subject of Modern Slavery, and to building supply chain capability through the provision of funded training. We look forward to the coming year and to maximising opportunities for further supplier engagement.

**Pamela Zielinski, Construction Programme Manager,
Stronger Together**



We supported the annual Anti-Slavery Day on the 18th October by sending out a series of communications, to help Saint-Gobain colleagues in all brands and at all locations to spot the signs of modern slavery, and know what to do. In 2021 we were pleased to help promote the new hand signal launched by Stronger Together by encouraging the use of the signal and raising people's awareness to understand the signal.

A victim using the signal will raise their hand, tuck in their thumb, then enclose it with their fingers.

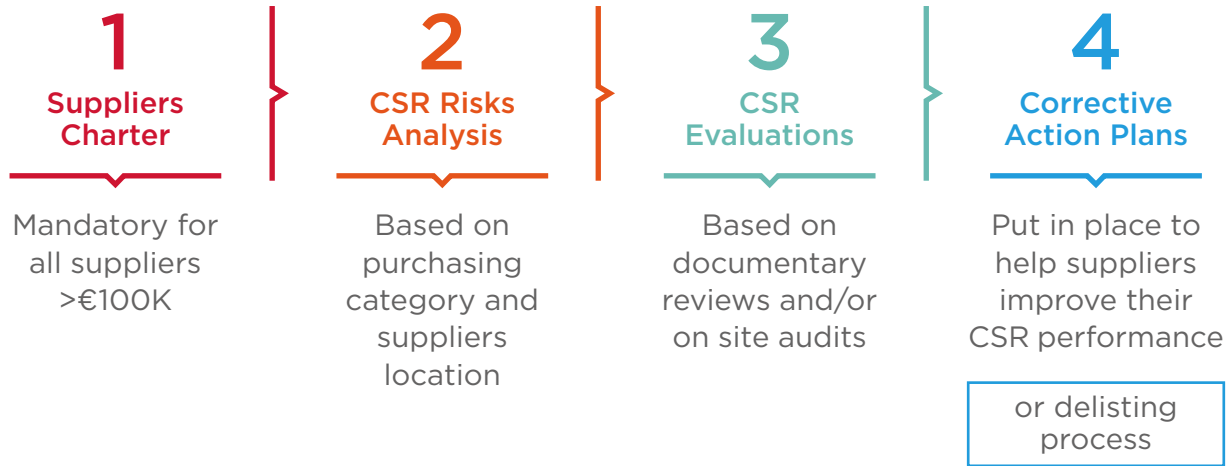
LEARN THIS.

It might help someone who really needs your help.



RISK ASSESSMENT AND MANAGEMENT

CSR risks in our supply chain are identified through our responsible purchasing program which is made up of four main steps:



This CSR risk assessment process helps to identify poor or non-existent management policies which can be indicators of the risk of modern slavery within our supply chain. The on-site audits performed as part of the CSR evaluation may also raise suspicions of forced labour or identify a risk of exploitation.

THE SUPPLIERS CHARTER

The **Suppliers Charter** is the tool we use to obtain the commitment of our suppliers on a series of key themes; respect for the right to development, employee rights, health and safety, legality and the environment.

Its signature is an essential condition for obtaining a commercial partnership with Saint-Gobain and it is mandatory for suppliers representing more than €100,000 of spend.

Our Buyers agree to our **Purchasers Charter**, in which they commit to principles of behaviour and business rules.

SUPPLY CHAIN RISK ASSESSMENT AND CONTROL MEASURES

Suppliers deemed to have a high risk through our CSR risk calculator will be invited to undertake a CSR assessment through our dedicated assessment tool which produces ratings and detailed scorecards through an evidence-based assessment to understand a suppliers CSR performance. This assessment is adapted to reflect the business categories and takes into account relevant industry certifications in 150 countries and is aligned with global standards like the UN Global Compact. The areas assessed through this digital audit are; environment, labour and human rights, and ethics and sustainable procurement.

After completion of this assessment, we categorise our suppliers using the following guidelines;

CATEGORY	VALIDITY	EXPECTED ACTION	NEXT STEPS
HIGH RISK	0 months	6 months to implement a Corrective Action Plan	Mandatory within 6 months: External on-site audit After this, reduce to medium risk or delist
MEDIUM RISK	12 months	12 months to implement a Corrective Action Plan	After 12 months: External on-site audit recommended/on-site audit/new assessment based on score
UNDER CONTROL	24 months	Recommendation to implement a Corrective Action Plan	After 24 months: New assessment or on-site audit
OPPORTUNITIES	36 months	Considered as Recommended Suppliers	After 36 months: New assessment or on-site audit

Depending on the level of risk identified, the validity period of the assessment is determined and where required a Corrective Action Plan is implemented, and if necessary an on-site audit is carried out. Saint-Gobain’s approach is to work with the supplier to improve their CSR performance.

We also have a modern slavery questionnaire which we send to suppliers in high risk categories for modern slavery in the UK. Developed in partnership with Stronger Together, this can highlight factors indicative of forced labour which would be escalated to an on-site audit.

We can utilise our own trained auditors to perform a Duty of Care Audit which can be adopted to specific scenarios to assess suppliers.

WHISTLEBLOWING SYSTEM

Whilst our CSR risk assessment process can help us to identify poor worker conditions/rights and raise suspicions of labour exploitation, the most effective way for us to identify risks of modern slavery within our supply chain is through our whistleblowing system. Our UK Confidential Hotline 0844 847 6649 allows all of the Group’s stakeholders (customers, suppliers, trade unions, authorities etc.) to report breaches of the law, our Principles of Conduct and Action, or other internal policies, in confidentiality through a secure online system. All reports through this system are processed and investigated as applicable, and appropriate measures are taken when justified. An annual report on incidents involving forced or mandatory labour is published in our [Registration Document](#).

There were **0** reports involving/ alleging modern slavery breaches through our whistleblowing system in 2022.

RISK MANAGEMENT

Based on advice and training from Stronger Together, we’ve identified categories in our supply chain which we believe are at a higher risk of modern slavery, for example waste management. Our Purchasing team works closely with suppliers in these categories to manage the risk of modern slavery. We encourage our suppliers to adopt policies and procedures within their business that would help to identify modern slavery from their own suppliers, to reduce risk of forced labour throughout the whole supply chain.

GOVERNANCE

Overall accountability for modern slavery within our operations sits with the Executive Board, chaired by our CEO Mike Chaldecott, who have final sign off.

Saint-Gobain strive to provide training on and raise awareness of modern slavery, particularly within our HR and Purchasing community, so that our colleagues are able to identify potential risks of modern slavery and use the tools available to take appropriate action.

TRAINING

Through our sponsorship with Stronger Together, we have access to their training workshops aimed at Site/Project Managers and those responsible for modern slavery/human rights within their business/supply chain. We offer this training to our suppliers to help them to understand how modern slavery occurs in the construction sector, the potential risks and the impact.

To date,

33 | Saint-Gobain suppliers have completed the Stronger Together 'Tackling Modern Slavery in the Construction Sector' training programme, including suppliers in cleaning, pallets, waste and security.

As well as this training, we have access to free webinars and resources from Stronger Together that can be used by our suppliers to help them to tackle modern slavery within their business and supply chain.

We communicate details of the Stronger Together training courses and webinars to our suppliers through the Saint-Gobain Purchasing team, targeting suppliers in our high-risk categories. We also communicate details of the webinars and training to key people in our business - those involved in Supply Chain, Purchasing and HR - to raise awareness of modern slavery.

Saint-Gobain have an e-learning pathway specifically for our own employees that focuses on forced labour and modern slavery. The content is reviewed and refreshed on a regular basis.

Through our membership of the **Supply Chain Sustainability School** our employees have access to a range of resources and learning pathways on modern slavery.

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

