

MODERN SLAVERY STATEMENT 2025

SAINT-GOBAIN UK



Introduction from our CEO



Dean O'Sullivan CEO Saint-Gobain
UK & Ireland

This is the Saint-Gobain UK Modern Slavery Statement, published in accordance with the Modern Slavery Act 2015 and relating to the financial year ending 31st December 2025. It sets out the policies, processes and actions we have in place to prevent modern slavery and human trafficking within our operations and supply chains.

Our vision is to be the worldwide leader in light and sustainable construction. Through innovation and collaboration, we are committed to improving daily life by creating, designing and advocating for building solutions that enhance performance, sustainability and comfort.

We recognise that the construction sector faces a heightened risk of modern slavery. As a business, we are determined to play our part in tackling this issue. By strengthening our approach to identifying and managing risk, and by working closely with our suppliers, we are committed to driving meaningful progress in the fight against modern slavery across our value chain.

This statement has been reviewed and approved by the Board of Saint-Gobain UK & Ireland on 8th June 2026.



GOVERNANCE

Overall accountability for modern slavery within our operations sits with the Executive Board, chaired by our CEO Dean O'Sullivan, who have final sign off.

CONTENTS

- 02/ Introduction & Governance
- 03/ Our business and supply chain
- 04/ Policies
- 05/ Collaboration
- 06/ Due Diligence and Risk Management
- 08/ Actions
- 09/ Training



OUR BUSINESS AND SUPPLY CHAIN

The Saint-Gobain Group operates in 76 countries with over 160,000 employees. Saint-Gobain in the UK includes 16 businesses. We design and manufacture 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.

You can read more about our business on our [website](#) and in the [Saint-Gobain Universal Registration Document 2025](#).

MAKING THE WORLD A BETTER HOME

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.



LEAD & GROW: OUR STRATEGIC PLAN

Saint-Gobain is opening a new chapter with Lead & Grow 2030: an ambitious and collective roadmap designed to guide the entire Group toward sustainable and profitable growth. It builds on our purpose, Making the World a Better Home, our vision to be the worldwide leader in light and sustainable construction, our achievements and our commitment to transforming the construction sector for the long term.

OUR LEGAL ENTITIES



Adfil Limited



BPB Limited



Saint-Gobain Limited



Brickspan Developments Limited



Calders and Grandidge (Boston) Limited (Divested January 2026)



Farécla Products Limited



F.I.C. (UK) Limited



Kilwaughter Minerals Limited



Leca Denmark A/S



Okarno Limited



Saint-Gobain Construction Products UK Limited



Saint-Gobain Construction Chemicals UK Limited



Saint-Gobain Glass (United Kingdom) Limited



Saint-Gobain High Performance Solutions UK Limited



Saint-Gobain Isover UK Limited



Saint-Gobain Performance Plastics Rencol Limited



Vetrotech Saint-Gobain (International) AG

While this statement is prepared to meet the requirements of the UK Modern Slavery Act 2015, it also reflects the activities of our Ireland operations.

The following Irish entities fall within the scope of these operations and are subject to the same management oversight and supply chain governance arrangements:

Saint-Gobain Construction Products (Ireland) Limited

Saint-Gobain Life Sciences Ireland Limited

Saint-Gobain Mining (Ireland) Limited

Saint-Gobain Construction Chemicals Ireland Limited

Kilwaughter Minerals (Ireland) Limited

All such entities adhere to Group, and regional policies and procedures designed to prevent modern slavery and human trafficking, including consistent standards for supplier onboarding, monitoring and ethical conduct



POLICIES

All purchasing activity across our extensive 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](#).

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

- [Human rights policy](#)
- [Anti-Corruption Policy](#)
- [UK Whistleblowing policy](#)
- [Tackling Modern Slavery Policy](#)
- [UK Counter Fraud Policy 2025](#)

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.



stronger together

Responsible recruitment | Fair work | Free from exploitation

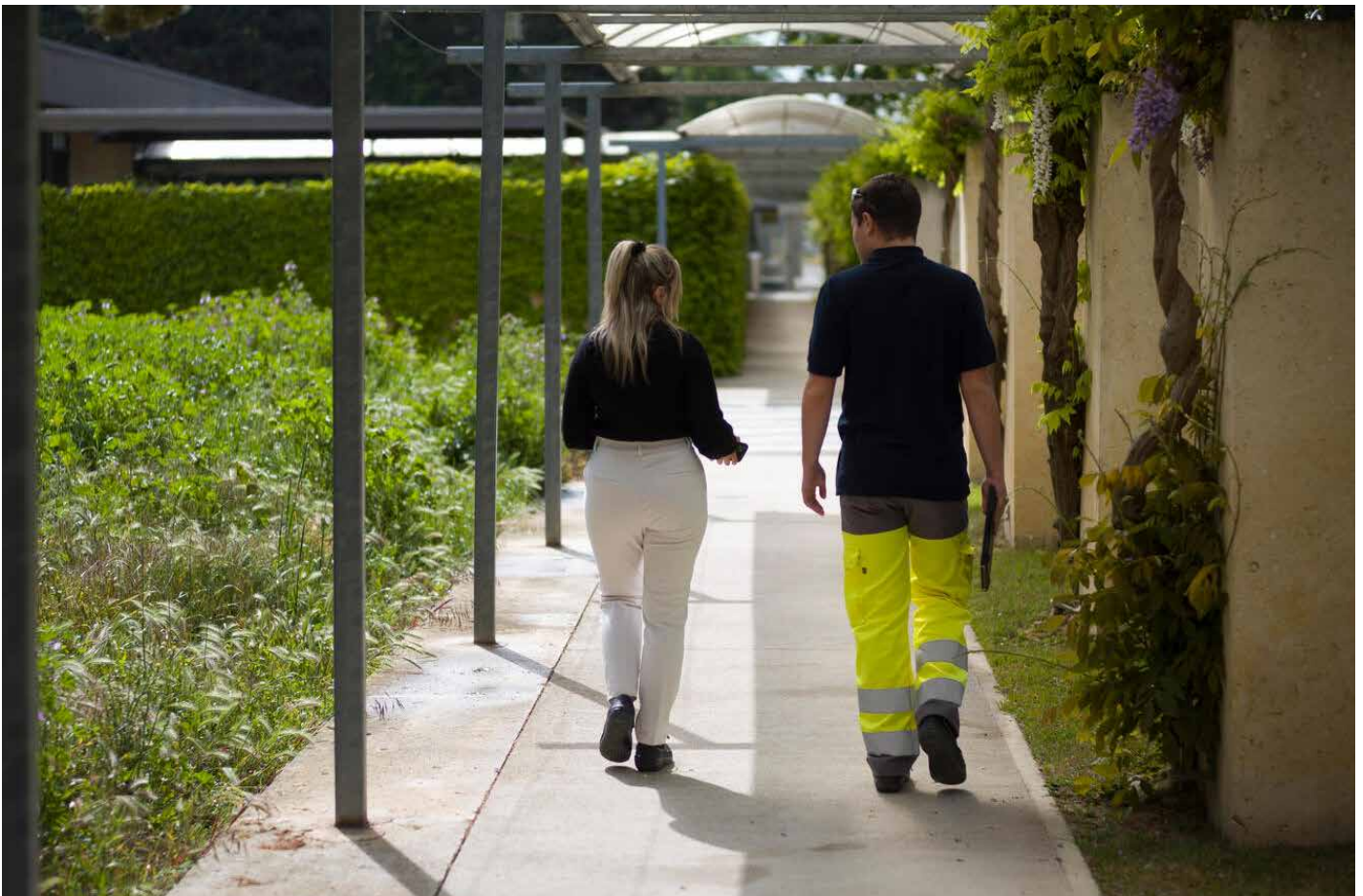
We are a sponsor of the **Stronger Together Construction and Property Programme** which supports businesses in the construction industry to tackle modern slavery. Through the programme, businesses across the construction supply chain are supported in taking actions to mitigate modern slavery within their 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 Programme 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.

In May 2025, we hosted at our office in London and participated in Stronger Together's Business Partner event on "Transparent recruitment". The event featured key speakers, including Sedex and Just Good Work, and focused on transparency, including ensuring job information is clear, accurate and fully understood by workers throughout their recruitment journey.



Saint-Gobain UK supported the Anti-Slavery Week campaign by Stronger Together (13th - 18th October 2025) through raising awareness using our social media channels.





DUE DILIGENCE AND RISK MANAGEMENT

CSR (Corporate, Social, Responsibility) risks in our supply chain are identified through our responsible purchasing programme 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. This 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 or frameworks 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 onsite 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 confidence through a secure 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 [Saint-Gobain Universal Registration Document 2025](#).

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 to help identify modern slavery within their own suppliers, to reduce risk of forced labour throughout the whole supply chain.

We recognise failures in supply chain oversight may also give rise to broader legal and ethical risks, including under evolving UK corporate accountability frameworks, and have embedded appropriate controls across our compliance programme.

ACTIONS

In 2025 we selected the following high risk services: Waste Management, Warehousing and Temporary Recruitment to perform new due diligence audits on our key providers. Within our own businesses we will also be reviewing our payroll and recruitment procedures to make sure they continue to be robust as well as working with newly acquired businesses and new exec members to raise awareness and responsibilities.



1. We completed a review of our waste management providers and conducted audits on a selection based on calculated risk. The review was successful in sharing best practice and raising awareness.
2. We worked with our strategic logistics partner to understand the potential modern slavery and exploitation risks in our distribution hub warehouse and local warehousing operations managed by them. We wanted to understand how these risks were mitigated and prevented. A visit to the distribution hub warehouse was supported by a senior director of the Saint-Gobain UK Board and was reassured by the procedures in place.
3. A review of Temporary Labour providers was started in 2025 and will continue into 2026.
4. Our recruitment procedures were reviewed and updated.



PLANNED ACTIONS 2026

1. Review and update modern slavery policy and guidance documentation, including updates regarding the Fair Work Agency.
2. Review and update the internal digital training course for employees and launch a new company wide campaign for completion.
3. Actively encourage first tier suppliers to engage with the Stronger Together training offer and free of charge resources.
4. Complete audits of strategic Temporary Labour Providers, in particular any new Labour Provider gaining business through tenders.

TRAINING

Through our sponsorship of the Stronger Together Construction and Property Programme, 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, property and warehousing sectors, including the potential risks and the impact.

To date,

53

Saint-Gobain suppliers have completed the Stronger Together 'Tackling Modern Slavery in the Construction Sector', 'Tackling Modern Slavery in UK business', or 'Tackling Modern Slavery in UK Warehousing' training workshops, 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 focusses on forced labour and modern slavery.

Through our membership of the [Supply Chain Sustainability School](#) our employees have access to a range of resources and learning pathways on modern slavery.





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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/corporate-social-responsibility