

# TACKLING MODERN SLAVERY

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POLICY

SAINT-GOBAIN UK & IRELAND





## Purpose of this policy

Saint-Gobain UK & Ireland commits to developing and adopting a proactive approach to prevent, respond to, and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within its workplaces and supply chains.

## Scope

**This policy applies to the following legal entities in the UK and the Republic of Ireland:**

### OUR LEGAL ENTITIES

#### THE UNITED KINGDOM

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

#### THE REPUBLIC OF IRELAND

- Chemtec Admixtures Limited GCP Products (Ireland) Limited
- Saint-Gobain Building Distribution (ROI) Limited (PDM)
- Saint-Gobain Construction Products (Ireland) Limited
- Saint-Gobain Life Sciences Ireland Limited
- Saint-Gobain Mining (Ireland) Limited
- Saint-Gobain Performance Plastics Ireland Limited

## Definitions

**Modern slavery** is a broad term used to encompass offences that involve one person depriving another person of their liberty, to exploit them for personal or commercial gain.

**Forced labour** is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

**Debt-bonded labour** is where a person's labour is demanded as a means of repayment for a loan or service.

**Human trafficking** is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.

**Hidden labour exploitation** is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider.

## Legal & Regulatory Framework

### United Kingdom

To combat modern slavery in the UK, legislation was introduced in England and Wales, Northern Ireland, and Scotland

The Modern Slavery Act 2015 for England and Wales

The Human Trafficking and Exploitation (Scotland) Act 2015

The Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015

### Republic of Ireland

Criminal Law (Human Trafficking) (Amendment) Act 2013

- Aligned Irish legislation with the EU 2011 Directive

2nd National Action Plan to Prevent and Combat Human Trafficking

- 65 actions identified to address trafficking offences in Ireland

## Responsibility

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

All employees have a responsibility to work in accordance with our [Principles of Conduct and Action](#).

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

## Policy Commitments

### Roles and responsibilities for tackling modern slavery risks:

- **HR & CSR Director, UK & Ireland**, Accountable for the effective implementation of the recruitment policies of the businesses in scope including post recruitment due diligence checks and monitoring of wages and salaries.
- **Chief Compliance and Business Ethics Officer, UK & Ireland**, responsible for investigating incidents raised through the whistleblowing facility.
- **Head of Sustainable Procurement UK & Ireland** – Responsible for the publication of the annual Modern Slavery Statement. To promote awareness and training to employees and suppliers. To complete the category risk assessment on an annual basis, to identify the high-risk suppliers, in particular high-risk contractors working on site for example cleaning contractors and support the purchasing community with issuing of the questionnaire, reviewing the supplier responses and assisting the local purchasers with improvement plans, re-assessment of the supplier and support onsite audits when required.
- **Procurement Purchaser** – To issue the supplier questionnaire to all high-risk suppliers, to communicate and support the suppliers to ensure feedback is received promptly and correctly, to work alongside the Sustainable Procurement team with improvement plans, to assist Sustainable Procurement team with onsite audits when required.
- **Leadership within the Organisation** – have a responsibility to complete the training and to “call things out”.
- **All Employees** have a responsibility for the Health & Safety of their colleagues.

## Training

### We undertake the following training to build knowledge and awareness to prevent and address modern slavery risks:

- 1. Internal Training Platform:** Saint-Gobain have developed an e-learning pathway specifically for our own employees that focusses on forced labour and modern slavery.
- 2. 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 our suppliers a free place to attend the “Tackling Modern Slavery in the Construction Sector” workshop, to help them to understand how modern slavery occurs in the construction sector, the potential risks and the impact.

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

<https://www.supplychainschool.co.uk/topics/sustainability/modern-slavery/>

## Supporting Policies

Saint-Gobain 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.

### • [Human Rights Policy](#)

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.

### • [Suppliers](#) and [Purchasers 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.

### • [Anti-Corruption Policy](#)

The Group has designed an anti-corruption programme outlining corruption prevention and detection obligations which are reflected in a zero-tolerance policy.

### • [Whistleblowing Policy](#)

The Saint-Gobain Group set up an ethics and professional alert system. This system, open to all the Group's stakeholders (customers, suppliers, shareholders, trade unions, NGOs, local communities or authorities, the State, etc.) it allows everyone to report, if they wish to do so and in complete confidentiality, breaches of the law, our Principles of Conduct and Action and our internal policies.

## Assessment of Modern Slavery Risks

CSR risks in our supply chain are identified through our responsible purchasing programme, which is made up of four main steps, defined by our duty of vigilance plan.

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.

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.

**Modern Slavery Questionnaire:** we have a modern slavery self-assessment questionnaire developed with Stronger Together that we ask suppliers in high-risk categories to complete.

**Investigating Modern Slavery Risks:** we can adapt our "Duty of Care Audit" to specific scenarios to assess suppliers.

## Response Protocol

Saint-Gobain UK & Ireland have a separate document on our response protocol called [If you suspect Modern Slavery, what should you do?](#)

## Company Contacts

**To report your concerns or to request guidance contact:**

- **Head of Sustainable Procurement, Saint-Gobain UK & Ireland**
- **HR & CSR Director Saint-Gobain UK & Ireland**
- **Chief Compliance and Business Ethics Officer, Saint-Gobain UK & Ireland**
- **Procurement Director, Saint-Gobain UK & Ireland**

If we do discover a suspected case, we would alert the appropriate authorities and follow their instructions as not to jeopardise police operations or criminal prosecutions or cause more harm to the potential victims.

## Communication

Our policy is to engage with third parties, not to work alone. Saint-Gobain UK & Ireland has an **External Advisory Panel:** A group of external, independent panel members who are encouraged to challenge and scrutinise our approach to conducting business including CSR topics.

Our Communications team regularly share articles and training opportunities with employees through our "Skyline" employee newsletter. They also share and promote relevant communications on social media platforms.

Our **[Modern Slavery Statement](#)** is published on our website and on the Government Slavery Statement Registry.