



## Saint-Gobain UK and Ireland

# “WHISTLEBLOWING” POLICY

Saint-Gobain is proud to share strong values with its employees around its code of ethical conduct for a fair and responsible practice of the business. We carry out our business in compliance with [Our Principles of Conduct and Action](#) and in the furtherance of [Our Purpose – Making the World a Better Home](#).

Saint-Gobain is committed to the highest standards of openness, probity and accountability. An important aspect of accountability and transparency is a mechanism to enable individuals to voice concerns fairly.

Where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation, this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management.

This policy sets out Saint-Gobain’s process to enable individuals to raise such concerns and aims to encourage individuals to report suspected wrongdoing as soon as possible, in the knowledge their concerns will be taken seriously and investigated professionally, impartially, and with reassurance they can raise concerns without fear of reprisals.

This policy is anchored in our Principles of Conduct and Action, specifically Respect for Others and Respect of the Law and is intended to assist individuals who believe they have discovered malpractice, harm, wrongdoing or impropriety. It is not designed to reconsider any personal matters which have already been addressed under harassment, complaint, disciplinary or other procedures. If you have a concern or complaint relating to your own personal circumstances, such as the way you have been treated at work you are encouraged in the first instance raise these via the Grievance Policy and Procedure.

This policy is non-contractual and may be amended from time to time.

## I. Scope of the Policy

This policy is designed to enable Saint-Gobain’s employees, temporary workers, agency workers, officers, consultants, contractors, interns, trainees, apprentices, volunteers, customers, suppliers and other stakeholders (any individual or organization affected by the decisions made by Saint-Gobain) to raise genuine concerns which relate to suspected wrongdoing or dangers at work. This may include:

- breach of the Saint-Gobain Principles of Conduct and Action;
- breach of human rights and fundamental freedoms, in particular the fight against discrimination and harassment;
- breach of the Internal Control rules and procedures;
- breach of any other Saint-Gobain internal policies and procedures;
- criminal activity and offences;
- failure to comply with any legal or professional obligation;
- danger to health and safety;
- serious harm to the environment;

- any conduct or situation contrary to [Competition Law](#) or under our [Bribery and Corruption Policy](#);
- our fight against financial mismanagement and fraud (including financial, accounting, tax and misappropriation of assets);
- conduct likely to damage Saint-Gobain's reputation or financial wellbeing;
- serious risks to the Group's IT security;
- unauthorised disclosure of confidential information including intellectual property rights;
- a serious and manifest breach of an international undertaking or regulation;
- negligence; and/or
- the deliberate concealment of any of the above matters.

For the purposes of this policy, any individual who raises such concerns under this policy is referred to as a "whistleblower".

The procedure for handling concerns raised under this policy is set out below. Concerns may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. grievance or disciplinary processes.

## II. Procedures for making a disclosure

Individuals are encouraged to disclose any concerns they might have to their line manager or primary contact at Saint-Gobain (either in person or in writing) in the first instance. They may be able to agree a way of resolving your concern quickly and effectively. Individuals may also speak with senior management, the EHS teams, Human Resources and the Employee Relations teams.

However, if this is not appropriate (e.g. because the matter is more serious, you feel your line manager, primary contact or other team has not addressed your concern, or you prefer not to raise the issue with your line manager, primary contact or other team for any reason), concerns can be reported by:

- contacting Saint-Gobain on the Whistleblowing Hotline on 0800 132 368 - this line is independently manned 24/7 and the call handler will capture whatever details the individual is prepared to disclose, then will forward the details to the Legal Department to progress.
- emailing in confidence to [GROUP-COMPLIANCE-ALERT-UK](#) for the UK and [GROUP-COMPLIANCE-ALERT-IE](#) for Ireland;
- directly contacting one of the Security Consultants from the Group Security Team;
- contacting the Chief Compliance and Business Ethics Officer and/or Director of Legal Services for the UK and Ireland. Contact details are set out at the end of this policy; or,
- using the Group Web Online Alert System <https://www.bkms-system.net/saint-gobain/>

### 1. Investigation

Once a concern has been raised, Saint-Gobain will carry out an initial assessment to determine the scope of any investigation. Saint-Gobain may appoint an investigator or team of investigators, including staff with relevant experience of investigations or specialist knowledge of the subject matter. In some cases, Saint-Gobain may appoint external investigators (e.g. independent legal advisors or specialist consultants). The individual(s) conducting any such investigation will be appointed via the Chief Compliance and Business Ethics Officer.

The whistleblower may be required to attend additional meetings to provide further information and, if they are an employee, may bring a colleague or union representative to any such meetings. Any

companion must respect the confidentiality of the disclosure and any subsequent investigation. Saint-Gobain may ask the whistleblower to choose another companion if, in Saint-Gobain's reasonable opinion, their choice of companion is inappropriate. Individuals will not ordinarily be entitled to be accompanied by a lawyer or other legal professional.

The investigator will be impartial and adhere to all confidentiality obligations and will consider whether it is appropriate or necessary to involve other parties (e.g. Saint-Gobain Business Controls or the police).

The complaint will be investigated by the investigator with the assistance, where appropriate, of other individuals / bodies. It is not possible to lay down precise timescales for this process, which may vary depending on the nature of the complaint and complexity of the investigation. The investigator will ensure investigations are undertaken without undue delay.

## **2. Outcome**

Saint-Gobain will aim to keep the whistleblower informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent Saint-Gobain from providing the whistleblower with specific details of the investigation or any disciplinary action taken as a result. Any information about the investigation and its outcome which is shared must be treated as confidential.

Saint-Gobain always aims to deal with whistleblowing concerns fairly and in an appropriate way. However, the outcome of the investigation will not always be what the whistleblower is seeking. If a whistleblower is not happy with the way their concern has been handled, they can raise it with the Chief Compliance and Business Ethics Officer and/or Director of Legal Services for the UK and Ireland. Contact details are set out at the end of this policy. In the event either of these roles have been involved in the investigation outcome(s), the whistleblower may be given an alternative route to escalate their concern.

## **3. External disclosures**

This policy aims to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace and, in most cases, an individual should not find it necessary to alert anyone externally.

However, Saint-Gobain recognises the lawful rights of individuals to make disclosures to external prescribed persons (e.g. a regulator) in some circumstances. It will very rarely (if ever) be appropriate to contact the media and we strongly encourage individuals to seek advice before reporting a concern to anyone external as such disclosure may affect their legal protections. The independent UK whistleblowing charity, Protect, operates a confidential Advice Line. They also have a list of prescribed regulators for reporting certain types of concern. A similar service is offered by the Citizens Information service in Ireland. Contact details for both organisations are at the end of this policy.

Whistleblowing concerns may sometimes relate to the actions of a third party, such as a Saint-Gobain customer, supplier or service provider. In some circumstances, the law will protect individuals who raise such concerns with the third party directly. However, individuals are encouraged to report such concerns internally first, and you can contact your line manager or primary contact at Saint-Gobain or the Chief Compliance and Business Ethics Officer and/or Director of Legal Services for the UK and Ireland for guidance.

## III. Safeguards

### 1. Protection

It is understandable a whistleblower may be worried about possible repercussions. Saint-Gobain encourages openness and will support individuals who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers should not suffer any detrimental treatment as a result of raising a genuine concern under this policy. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any of Saint-Gobain's employees or executive officers believe they have suffered any such treatment, they should raise it formally using our Grievance Procedure. If Saint-Gobain workers, agency workers, non-executive officers consultants, contractors, interns, volunteers, clients, suppliers and any other third parties believe they have suffered any such treatment, they should contact the Chief Compliance and Business Ethics Officer.

Threats or retaliation against whistleblowers in any way will not be tolerated and allegations of such conduct will be investigated. If any of Saint-Gobain's employees or executive officers are involved in any such conduct, they may be subject to disciplinary action, and if any of Saint-Gobain's workers, agency workers, non-executive officers, consultants, contractors, interns, volunteers, clients, suppliers or any other third parties are involved in any such conduct, Saint-Gobain may vary or cease any association or affiliation with such individuals (which may include the termination of any contractual arrangements). Further, in some cases the whistleblower could have the right to sue individuals who engage in retaliatory conduct personally for compensation in an employment tribunal.

Confidential support and counselling is available to employees as part of Saint-Gobain's Employee Assistance Programme for various matters but including, stress and anxiety, domestic abuse, bereavement, debt, legal information, relationships and lifestyle addictions.

### 2. Confidentiality and Anonymous Allegations

We hope individuals will feel able to voice concerns openly under this policy. Nonetheless, Saint-Gobain will treat all such disclosures in a sensitive manner and will only disclose the identity of the individual making the allegation where necessary to progress any investigation or if required by any legal obligation or governmental authority (which may include during the course of any police or governmental investigation and/or criminal or civil proceedings). It is worth noting the investigation process itself may reveal the source of the information, and the individual making the disclosure may be asked to provide a statement as part of the evidence required during the investigation.

If an individual does want to raise a concern confidentially, Saint-Gobain will make every effort to keep the individual's identity secret and, if it is necessary for anyone investigating the concern to know the individual's identity, this will be discussed with the individual. A person who is the subject of a whistleblowing allegation may not seek to utilise a data subject access request to obtain information concerning the identity of the whistleblower.

Concerns can be raised anonymously although individuals are always encouraged to share their identity and engage in dialogue with Saint-Gobain. Proper investigation may be more difficult or impossible where concerns are expressed anonymously and further information cannot be obtained from the individual. It is also more difficult to establish whether any anonymous allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Chief Compliance and Business Ethics Officer and appropriate measures can then be discussed to preserve confidentiality. If you are in any doubt you can seek advice from Protect, the independent UK whistleblowing charity, via their confidential Advice Line or the Citizens Information service in Ireland. Contact details of both organisations are at the end of this policy.

### 3. Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against the individual. If, however, Saint-Gobain concludes an individual has made malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may then be taken.

In making a disclosure the individual should exercise due care to ensure the accuracy of the information.

## IV. Contact Details

<b>Whistleblowing Confidential Hotline</b> 0800 132 368 (24 hour)	
<b>Chief Compliance and Business Ethics Officer</b>	David Clark <a href="mailto:david.e.clark@saint-gobain.com">david.e.clark@saint-gobain.com</a>
<b>Director of Legal Services</b>	Jonathan Cheeseman <a href="mailto:jonathan.cheeseman@saint-gobain.com">jonathan.cheeseman@saint-gobain.com</a>
<b>HR Shared Services – Employee Relations Team</b>	+44 (0) 2476 438600
<b>Saint-Gobain UK&amp;I Investigative Team</b>	Kevin Graham 07795 604038 Andy Hunt 07710 090219 Nicola Blakeburn 07711 189908 Clifford Davies 07894 815744 (If unavailable at the time of call the investigator will revert if you leave your details) <a href="mailto:security@sqbd.co.uk">security@sqbd.co.uk</a>
<b>Group Compliance Alert email address</b>	<a href="mailto:GROUP-COMPLIANCE-ALERT-UK">GROUP-COMPLIANCE-ALERT-UK</a> (UK) <a href="mailto:GROUP-COMPLIANCE-ALERT-IE">GROUP-COMPLIANCE-ALERT-IE</a> (Ireland)
<b>Group Web Online Alert System</b>	<a href="https://www.bkms-system.net/saint-gobain/">https://www.bkms-system.net/saint-gobain/</a>
<b>Employee Assistance Programme</b> (Free 24 hour Confidential service)	Health Assured 0800 030 5182 Website: <a href="http://www.healthassuredeap.com">www.healthassuredeap.com</a>  AXA Healthcare 0800 0727 072 Website: <a href="http://www.axabesupported.co.uk">www.axabesupported.co.uk</a>
<b>Protect</b> (Independent UK whistleblowing charity)	Helpline: 0203 117 2520 Online contact form: <a href="https://protect-advice.org.uk/contact-protect-advice-line/">https://protect-advice.org.uk/contact-protect-advice-line/</a> Website: <a href="https://protect-advice.org.uk/">https://protect-advice.org.uk/</a>
<b>Citizens Information (Ireland)</b>	Phone Service : <b>0761 07 4000</b> , Monday to Friday, 9am-8pm. Website: <a href="https://www.citizensinformation.ie/en/">https://www.citizensinformation.ie/en/</a>