



SUSTAINABILITY DECLARATION IN ACCORDANCE WITH THE GERMAN SUPPLY CHAIN DILIGENCE ACT (LKSG)

The Compagnie de Saint-Gobain German branch as the parent company and its group companies fall within the scope of the LkSG within the meaning of Section 1 (1) sentence 2 no. 1 LkSG and assume responsibility for implementing the required measures of the LkSG.

Establishment of a risk management (Section 4 (1) LkSG) and implementation of regular risk analyses (Section 5 LkSG)

- We have established an appropriate and effective risk management system to ensure compliance with due diligence obligations and have carried out an appropriate risk analysis to identify human rights or environment-related risks and violations in our own business area and at our direct suppliers.
- We ensured that the results of the risk analysis were communicated internally to the relevant decision-makers.
- To integrate supply chain due diligence into the general risk and compliance management system, the reporting system to the Executive Board and the Audit Committee of the Supervisory Board in particular was aligned with the new requirements in addition to the processes, compliance guidelines, contracts and risk recording databases.

Definition of internal company responsibility (§ 4 III LkSG)

- In fulfilment of our legal obligations, a committee of human rights officers has also been appointed, which you can contact at Menschenrecht@saint-gobain.com

Submission of a declaration of principles (§ 6 II LkSG)

Our policy statement has been communicated to employees, the works council, direct suppliers and the public. It is available at the following link: <https://www.saint-gobain.de/assets/view/media/4136>

Establishment of preventive measures in the company's own business area (§ 6 I, III LkSG) and vis-à-vis direct suppliers (§ 6 IV LkSG)

- The human rights strategy set out in the declaration of principles was implemented in the relevant business processes, taking into account the risk level of the respective supplier, country risk and product risk.
- Suitable procurement strategies and purchasing practices have been developed and implemented to prevent or minimise the risks identified:
 - Responsible purchasing: The Saint-Gobain Group joined the United Nations Global Compact already in 2003 and applies the OECD Guidelines for Multinational Enterprises and the fundamental principles and rights of workers described in the ILO (International Labour Organisation) Declaration. In this context, it has in particular adopted a responsible purchasing policy, which is an integral part of the Group's policy for responsible development. More information on this specially developed code of conduct, which is also binding for direct suppliers, can be found at the following link
<https://www.saint-gobain.de/compliance-und-verantwortungsbewusster-einkauf>
 - As part of its "responsible purchasing" policy and in application of its vigilance plan, the Saint-Gobain Group carries out a supplier analysis based on risk mapping before assessing, if necessary, the environmental, social and ethical practices of its suppliers through documentary and documentary reviews or audits based on international standards (*hereinafter referred to as "assessments"*).
 - The approach and expectations of the Saint-Gobain Group with regard to its suppliers are set out in our "Suppliers Charter", which is available at the following link and which must be complied with by the supplier:
<https://www.saint-gobain.de/assets/view/media/3576>
 - A clause on responsible development was implemented in the purchasing contracts, which, among other things, obliges the direct supplier to comply with responsible purchasing.
 - The anchoring of preventive measures (own on-site inspections, audits and the utilisation of certifications) was also implemented for direct suppliers as part of this contract design. In addition to an ethics and compliance clause, the updated General Terms and Conditions of Purchase also include an LkSG clause in which the direct supplier covered by the LkSG undertakes to observe the provisions of the LkSG applicable to it and to pass them on to its own suppliers accordingly.

- Training is also provided in the relevant business areas (i.e. management level, purchasing and compliance).
- We also carry out risk-based control measures to check compliance with the human rights strategy contained in the declaration of principles in our own business area.

Taking remedial measures (Section 7 I to III LkSG) in its own business area and at the direct supplier (prevention, termination or reduction of the violation)

Should the above assessments reveal any discrepancies between the standard reference framework used and the supplier's practices, Saint-Gobain will determine with the supplier the corrective actions to be implemented. Failure to implement these measures may result in the exclusion of the supplier from the list and the early termination of the contract and all other contracts concluded with Saint-Gobain Group companies.

Establishment of a complaints procedure (Section 8 LkSG)

- A professional whistleblowing system has been set up for potentially involved parties, including employees in the supply chain, which also enables anonymous reporting of any event or behaviour that does not comply with the applicable laws and regulations. Any report can be sent via the following website:
<https://www.bkms-system.com/saint-gobain>

Implementation of due diligence obligations with regard to risks at indirect suppliers (Section 9 LkSG: establishment of a concept to minimise and avoid violations)

- With regard to indirect suppliers (in the chain down to the raw material supplier), a risk analysis and the implementation of preventive and remedial measures are carried out if we obtain "substantiated knowledge" of a human rights violation, i.e. in the case of "verifiable and serious information about a possible human rights or environmental violation".

Documentation (§ 10 I LkSG) and reporting (§ 10 II LkSG)

- The fulfilment of due diligence obligations is documented internally on an ongoing basis and retained for seven years.
- The results of the periodic risk analysis are compiled and made available to the management so that it can initiate any necessary measures.
- In addition, a report on the fulfilment of due diligence obligations in the past financial year is prepared and made publicly available free of charge on our website for a period of seven years no later than four months after the end of the financial year. You can find the link at [5026 \(saint-gobain.de\)](https://www.saint-gobain.de/5026)
- The report is also submitted to the Federal Office of Economics and Export Control no later than four months after the end of the financial year to which it relates (in 2024 for the first time before 30 June 2024).

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