

## **General Principles of conduct and action for the Saint-Gobain Group.**

The Saint-Gobain Group has developed a number of shared principles applied by both management and employees which have guided the activities of the Group over the years.

Today the Group wishes to give written expression to these principles in order to facilitate their communication and consolidate their implementation throughout the Group worldwide. The purpose of this document is also to make a public statement of Saint-Gobain's adherence to these basic principles of conduct and action, which apply to all companies forming the Group without regard to the country of activity.

The principles set out are not intended to be exhaustive but to cover the most essential areas. They are complemented, and may in the future be further complemented, by sometimes more specific rules having regard to local conditions or particular positions of responsibility, but in any case without detracting from the basic principles.

The application of these principles is a requirement for belonging to the Saint-Gobain Group.

### **Principles of Conduct**

The Saint-Gobain Group considers that the basic values shared by management and employees alike are professional commitment, respect for others, integrity, loyalty and solidarity. These are principles of conduct which apply to each one of us.

**Professional commitment** for us means mobilising to the best of one's ability the knowledge and know-how of the individual and also calls for training to keep both up to date. It requires personal commitment and a willingness to take on those tasks which have assigned and to acquire needed knowledge. It implies the effective contribution of each person in caring particularly for the environment and for worker health and safety.

**Respect for others** is an absolute prerequisite for the professional and personal development of each person. It must be applied throughout the Group worldwide and implies an acceptance of pluralism and others cultures and of people of all origins. It is expressed in a readiness to listen to others, to inform, to explain and to engage in dialogue.

**Integrity** requires a rigorous adherence to probity in one's professional activities. It admits of no compromising of the interests of the Group entrusted to the given individual in favour of that person's own private interests – whether in dealings within the Group or in dealings on behalf of the Group with third parties, whatever local practices might be.

Detailed rules of conduct may be adopted for certain categories of Group personnel where the nature of their responsibilities so requires.

**Loyalty** requires honesty and fairness in dealing with superiors, colleagues, subordinates and third parties dealing with the Group. In particular, it is incompatible with the pursuit of

self-interest where the latter conflicts with the goals of the individual Group company or the Group as a whole. It implies the adherence to the guidelines and internal rules of individual Group companies and of the Group as a whole.

**Solidarity** is based on a sense of individual responsibility at work which prevails over self-centered thinking and encourages team work and bringing out the best in each person. It means rejecting management or operational methods which are geared more to the self-satisfaction of given individuals rather than the interests of the particular Group company or the Group as a whole.

### **Principles of Action**

The Saint-Gobain Group wishes to set out the principles of action which govern the activity of all management and employees in the exercise of their professional responsibilities regardless of the country involved.

These principles of action contribute<sup>1</sup> to the realisation of sustainable development and responsible patterns of growth in accordance with the long-term strategy pursued by the Group.

### **Respect for the Law**

All Group companies are to apply in all areas all laws and regulations in force in those countries where they carry on business.

Particular attention is drawn to the areas described below.

All Group companies shall prohibit all actions which might breach applicable norms of competition law.

They shall refrain from any form of financing political parties or activities, even if allowed under local law.

They also are to reject all forms of active or passive corruption whether in domestic or international transactions<sup>2</sup>.

Furthermore, Group companies are to renounce exploiting loopholes or inadequacies in any such laws or regulations where this would mean non-compliance with the norms of the Saint-Gobain Group in the areas described below.

### **Caring for the Environment**

Group Companies are to actively promote the protection of the environment.

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<sup>1</sup> They are intended to embody the OECD Guidelines for Multinational Enterprises, adopted in June 2000.

<sup>2</sup> Covered by the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of 17th December 1997.

At company sites management methods shall be followed, wherever the site may be located, which allow measurable environmental performance standards to be set, and actual performance to be regularly evaluated and checked against the applicable standards.

They shall strive to raise the main relevant environmental performance standards of their own sites to the level of particularly effective performance standards found in the Group for comparable sites – even if that means going beyond the requirements of local legislation.

### **Worker Health and Safety**

Group companies are to take particular care to adopt all measures necessary to ensure the best possible protection against health and safety risks in the workplace.

They shall adopt risk reduction policies and follow-up on the due application of the same, checking actual results against the applicable standards. Such policies shall apply both to their own employees and to employees of sub-contractors where the latter are working on a Group site.

They shall strive to raise the main relevant health and safety performance standards of their own sites to the level of particularly effective performance standards found in the Group for comparable sites – even if that means going beyond the requirements of local legislation.

### **Employee Rights**

Group companies are to scrupulously ensure that employees' rights are respected.

They are to promote an active dialogue with their employees.

In addition, and without limitation, they shall respect the following rules, even if not provided for by applicable local law:

They shall refrain from any form of recourse to forced labour, compulsory labour or child labour<sup>3</sup> -- whether directly or indirectly or through sub-contractors where the latter are working on a Group site; and

They shall refrain from any form of discrimination of whatever kind with respect to their employees whether in the recruitment process, at hiring, or during or at the end of the employment relationship.

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<sup>3</sup> As defined by the applicable conventions of the International Labour Organisation

Each member of management and employee of the Saint-Gobain Group is personally responsible for applying these principles of conduct and action.

Each management level – company, business unit, Delegation or Branch, carries its own responsibility for ensuring the application of these principles of the Group.

The Branches and Delegations are to report regularly to the general management of the Group on how the principles are being applied.

The general management of the Group is to implement awareness and training programmes on order to promote these principles across the Group. It will stipulate the measures required to enable effective testing, and checking of actual results against the applicable standards, to be carried out.