

General Principles of Conduct and Action

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

Today the Group wishes to give written expression to these principles, to help us communicate them and reinforce 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 within the Group regardless of where they carry on business.

These principles are not intended to be exhaustive, but to address the 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.

Adherence to 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 principles of conduct apply to each of us.



Professional commitment

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 the tasks assigned and to acquire knowledge necessary to do the job. 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 applies throughout the Group worldwide. It implies an acceptance of pluralism and other 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 all professional activities. It means that no individual may compromise the interests of the Group entrusted to that individual in favour of his or her own private interests – whether in dealing within the Group or in dealing 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 company or the Group as a whole. It implies the adherence to the guidelines and internal rules of individual companies and of the Group.



Solidarity

is based on a sense of individual responsibility at work, which prevails over self-centered thinking. It encourages team work and bringing out the best in each person, in order to achieve the objectives of the company and the Group. It means rejecting management or operational methods geared more to the self-satisfaction of given individuals rather than the interests of the individual 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 activities of all management teams and employees in the exercise of their professional responsibilities, regardless of the country involved.

These principles of action⁽¹⁾ help us achieve responsible and sustainable growth, in accordance with the Group's long-term strategy.

(1) They are intended to embody the OECD Guidelines for Multinational Enterprises, adopted in June 2000.



Respect for the law

All Group companies must apply in all areas all laws and regulations of the countries where they do business. Particular attention is drawn to the areas described below. All Group companies must prohibit all actions which might breach applicable norms of competition law. They must refrain from any form of financing political parties or activities, even if allowed under local law. They must also reject all forms of active or passive corruption whether in domestic or international transactions⁽²⁾.

Furthermore, Group companies must not exploit 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.

(2) Covered by the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of 17th December 1997.



Caring for the environment

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

All company sites, wherever they are located, must be managed in a way that allows the setting of clear environmental targets and the regular monitoring of environmental performances and measuring the same against these targets. They must 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 must adopt risk reduction policies and follow-up on the due application of the same, checking actual results against the applicable standards. Such policies apply both to their own employees and to employees of sub-contractors, when the latter are working on a Group site.

They must strive to raise the main relevant health and safety performance standards of their own sites to the levels 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 must scrupulously ensure that employees' rights are respected. They must promote an active dialogue with their employees.

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

They must refrain from any form of recourse to forced labour, compulsory labour, or child labour⁽³⁾ – whether directly or indirectly or through sub-contractors when the latter are working on a Group site; and they must refrain from any form of discrimination with respect to their employees, whether in the recruitment process, at hiring, or during or at the end of the employment relationship.

(3)As defined by the applicable Conventions of the International Labour Organisation.

People at every level in the Saint-Gobain Group are individually responsible for applying these principles of conduct and action.

Each management level – company, business unit, Delegation or Sector, carries its own responsibility for ensuring that these principles are applied.

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

The general management of the Group will implement awareness and training programmes in order to promote these principles across the Group. It will decide on appropriate methods to verify compliance.

Glossary

Organization for Economic Cooperation and Development - OECD

Founded in 1961 following on from the OEEC (Organization for European Economic Cooperation), the OECD's main vocation was to strengthen the economy of European countries. Today, the OECD groups 30 member countries worldwide, all sharing a commitment to democracy and the market economy. It has active relationships with some 70 other countries, NGOs and parliamentary institutions.

Its missions have been extended to support economic growth and boost employment, raise living standards, maintain financial stability, help other countries develop their economies and contribute to the growth of world trade, taking into account the key issues of globalization.

Renowned for its publications and statistics, the OECD produces works covering the whole economic and social environment, from macroeconomics to trade exchanges, not forgetting education, development, science and innovation.

It also creates instruments adopted internationally, decisions and recommendations to promote new rules of the game where multilateral agreements are required to safeguard the progress of nations in a global economy.

www.oecd.org

OECD Guidelines for Multinationals

The Guidelines form a set of non-restrictive recommendations to multinational businesses in all the major areas of corporate social responsibility, including employment and industrial relations, human rights, the environment, information disclosure, the fight against bribery and corruption, consumer interests, science and technology, competition, and taxation. Adhering governments are committed to promoting these guidelines vis-à-vis multinational enterprises operating in or from their territories. Although these are not mandatory provisions, it is worth noting the activities of National Contact Points (NCP), i.e. government services in charge of promoting the Guidelines and conducting nationwide surveys.

OECD Convention dated December 17, 1997 on the fight against the corruption of foreign public officials

This Convention asks adhering Governments to ensure that the corruption of foreign public officials, complicity and attempts to corrupt are considered criminal offences under its law.

It defines corruption as being *"the fact for any person intentionally to offer, promise or grant any undue benefit, pecuniary or otherwise, whether directly or through intermediaries, to a foreign public official, for his benefit or for the benefit of a third party, in return for the official acting or refraining from acting in compliance with the performance of official duties, in order to obtain or retain a market or other improper advantage in the conduct of international business."*

International Labor Organization – ILO

Founded in 1919 through the Treaty of Versailles, the ILO became in 1946 the United Nations' first specialized agency. It seeks to promote social justice and in particular have human rights recognized at the workplace.

The ILO formulates international labor standards in the form of Conventions and Recommendations, setting minimum standards of basic labor rights: freedom of association, the right to organize, collective bargaining, abolition of forced labor, equality of opportunity and treatment, etc...

www.ilo.org

Conventions on fundamental labor rights

Adopted in 1998, the ILO Declaration on fundamental labor rights and principles groups conventions ensuring the promotion of fundamental values. These principles are notably:

Abolishing forced or compulsory labor

According to the fundamental conventions of 1930 on forced labor and 1957 on the abolition of forced or compulsory labor, the expression forced or compulsory labor means *"all work or service which is exacted from any person under the threat of any form of punishment and for which the said person has not offered himself voluntarily."*

Today, there are still millions of victims of forced labor worldwide.

Abolishing of child labor

Child labor constitutes a violation of fundamental Human rights and it has been demonstrated that this impedes their development. The facts show that there is a direct link between household poverty and child labor and that sending children out to work perpetuates poverty by keeping them away from school and limiting their chances for social promotion. In this context, the ILO norms and standards on child labor constitute wide-reaching international legal instruments to fight against this scourge.

A 1973 convention sets the general minimum age for admission to employment or work at 15 (13 for light work) and the minimum age for hazardous work at 18 (16 under certain strict conditions). A second convention issued in 1999 aims to abolish the worst forms of labor for under-18s, especially all forms of slavery or practices similar to slavery, such as the sale or trafficking of children, debt bondage and serfdom, as well as forced or compulsory labor.

To this day, over 130 countries have ratified at least one of these 2 conventions.

Global Compact

Saint-Gobain joined in 2003. Launched in July 2000 based on an idea from Kofi Annan, secretary general of the United Nations, Global Compact is an international initiative involving more than 2000 companies, NGOs and civil society organizations (trade unions, schools, UN agencies, etc.) around **ten universal principles** in the areas of **human rights**, **labor rights**, the **environment** and the **fight against corruption**. Using this international network, the aim is to jointly contribute towards developing a humane and sustainable economy.

By joining Global Compact, Saint-Gobain undertakes to integrate the 10 principles in its strategy and operations.

www.unglobalcompact.org

This document is a supplement to the general Principles of Conduct and Action of the Saint-Gobain Group



Dieses Dokument ist eine Ergänzung zu den Verhaltens- und Handlungsprinzipien der Saint-Gobain Gruppe.



World Class Purchasing



Pictures - Photos : Saint-Gobain Design and Concept - Conception / Réalisation : **because** www.because.fr

SUPPLIERS CHARTER

LIEFERANTEN CHARTA



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Saint-Gobain Group Suppliers Charter

Having signed up to the UN’s Global Compact, the Group has, since 2003, formalized its values through the General Principles of Conduct and Action applicable to all employees worldwide, and in doing so, confirmed its resolve to work towards responsible business growth.

Accordingly, the economic, social and environmental requirements of sustainable development are fundamental elements in the strategy of the Saint-Gobain Group.

For this reason, Saint-Gobain has decided to invite its suppliers to take part in this process within their own sphere of action or influence.

This is the purpose of the present Charter which Saint-Gobain asks its suppliers to support.

Their level of commitment in this domain is one of the deciding factors in selecting suppliers and Saint-Gobain will make sure that suppliers fully understand the Charter’s contents.

This Charter is an integral part of the documentation handed out by the Saint-Gobain in support of its consultations and is intended to be included in the contractual documents.

The Purchasing Departments of Saint-Gobain Group entities may be led, under certain circumstances, to take the measures they deem necessary to ensure full compliance with the Charter, notably by sending out questionnaires or conducting or having conducted specific audits at the suppliers’ and sub-contractors’ premises.

The Saint-Gobain Group expects its suppliers and sub-contractors to be mindful that their own suppliers and sub-contractors enable them to fully support the principles detailed in this Charter.

Saint-Gobain Lieferanten Charta

Nach der Unterzeichnung des Global Compact der UN im Jahre 2003 hat die Gruppe Ihre Wertvorstellungen in den Verhaltens-und Handlungsprinzipien formalisiert. Diese sind für alle Mitarbeiter weltweit gültig. Dadurch wird der Entschluss bekräftigt auf ein nachhaltiges

Geschäftswachstum hinzuarbeiten.

Demzufolge sind die wirtschaftlichen, sozialen und ökologischen Anforderungen einer nachhaltigen Entwicklung grundlegende Elemente in der Strategie der Saint-Gobain Gruppe.

Hierzu hat Saint-Gobain sich entschieden seine Lieferanten innerhalb ihres Wirkungs-oder Einflussbereiches zur Teilhabe an diesem Prozess einzuladen.

Das ist das Ziel dieser Charta für deren Umsetzung und Einhaltung Saint-Gobain seine Lieferanten um Unterstützung bittet.

Der Grad ihres Engagements in diesem Bereich ist einer der entscheidenden Faktoren bei der Auswahl von Lieferanten, deshalb will Saint-Gobain sicherstellen, dass die Lieferanten die Inhalte der Charta kennen.

Diese Charta ist Basis jeglicher Zusammenarbeit mit Saint-Gobain und wird Bestandteil eines jeden Vertrages.

Die Einkaufsabteilungen der Saint-Gobain Gruppe sind unter gewissen Voraussetzungen dazu angehalten, Maßnahmen zu ergreifen, die die umfassende Einhaltung der Charta gewährleisten.

Dies kann insbesondere durch das Versenden von Fragebögen oder durch die Durchführung von speziellen Audits an den Standorten der Lieferanten und Zulieferer geschehen.

Die Saint-Gobain Gruppe erwartet von ihren Lieferanten und Zulieferern, auch darauf zu achten, dass deren eigene Lieferanten und Zulieferer sie bei der Umsetzung der in der Charta aufgeführten Prinzipien unterstützen.



Respect the right to development **Einhaltung des Entwicklungsrechtes**

Suppliers guarantee their employees a decent standard of living. They participate as much as possible in the development of the country they operate in and work with all types of companies in compliance with this charter.

Die Lieferanten garantieren ihren Mitarbeitern einen angemessenen Lebensstandard. Soweit es ihnen möglich ist, beteiligen sie sich an der Entwicklung des Landes, in dem sie tätig sind. Ihre Zusammenarbeit mit anderen Unternehmen erfolgt in Übereinstimmung mit dieser Charta.

—
“Suppliers operate
in compliance
with this Charter”
—

—
“Lieferanten arbeiten
in Übereinstimmung
mit dieser Charta”
—



Employee rights

Mitarbeiterrechte

Regarding relations with their own staff, suppliers and subcontractors comply with the legal rules and regulations applicable in the countries where they operate as well as the norms set out by the International Labour Organization concerning workers' rights, especially in the area of social security, working hours and conditions, compensation and when it comes to exercising freedom of association.

In particular, suppliers and subcontractors undertake not to resort in any way, shape or form, either directly or through their own subcontractors or suppliers,

- to forced or mandatory labour,
- to child labour.

Finally, they make sure that their working practices are free from any form of job discrimination.

In Bezug auf die eigenen Mitarbeiter verpflichten sich die Lieferanten und Zulieferer zur Einhaltung aller gesetzlichen Vorschriften und Verordnungen der Länder, in denen sie tätig sind. Sie erfüllen die Normen der internationalen Arbeitsschutzorganisation in Bezug auf Arbeitnehmerrechte insbesondere im Bereich der Sozialversicherung, bei Arbeitszeiten und -bedingungen, Bezahlung und bei der freien Gewerkschaftsausübung.

Lieferanten und Zulieferer verpflichten sich in keinsten Weise, weder direkt noch indirekt oder über ihre Subunternehmer oder Lieferanten

- Zwangsarbeit und
- Kinderarbeit zu unterstützen.

Weiterhin ist sicherzustellen, dass die Arbeitsmethoden frei von Diskriminierungen jeglicher Art sind.

“Suppliers comply with the norms set out by the International Labour Organization”

“Lieferanten erfüllen die Normen der internationalen Arbeitsschutzorganisation”



Occupational health and safety

Arbeitsschutz

Suppliers and subcontractors endeavour to take the necessary steps to ensure occupational health and safety.

For their own activities, they implement a policy aimed at identifying and preventing health and safety risks affecting:

- their full-time and temporary members of staff,
- their customers' employees and the users of their products,
- their own suppliers and subcontractors' employees (temporary and full-time),
- the communities surrounding their facilities.

They inform the Saint-Gobain Group of any hazards or risks associated with their products or interventions on Saint-Gobain sites.

Finally, they make sure that their employees fully comply with both regulations and Saint-Gobain Health and Safety standards when called out to work on Saint-Gobain sites.

They inform Saint-Gobain of any incidents or non-conformities occurring.

Lieferanten und Subunternehmer verpflichten sich, erforderliche Maßnahmen zur Sicherstellung des Arbeitsschutzes zu ergreifen. Für ihre eigenen Tätigkeiten sind Arbeitsschutzrisiken zu definieren und vorbeugende Maßnahmen in entsprechenden Richtlinien zu beschreiben.

Dies gilt für:

- Vollzeit-und Teilzeitbeschäftigte,
- die Mitarbeiter der Kunden (insbesondere der ➤ Saint-Gobain Unternehmen) sowie die Verwender ihrer Produkte,
- ihre eigenen Lieferanten und Mitarbeiter von Subunternehmern (Teilzeit und Vollzeit) und
- die Städte und Kommunen in unmittelbarer Umgebung ihrer Standorte.

Sie informieren die Saint-Gobain Gruppe über alle Gefahren und Risiken, die durch ihre Produkte oder ihre Arbeiten an Saint-Gobain Standorten entstehen. Und schließlich stellen die Lieferanten sicher, dass die Mitarbeiter sich vollumfassend an die geltenden Arbeitsschutzbestimmungen und an die Saint-Gobain Gesundheitsschutz- und Sicherheitsvorschriften halten, wenn sie an den Standorten von Saint-Gobain arbeiten. Sie informieren Saint-Gobain über jeden Zwischenfall und jede Nichterfüllung der Sicherheitsanforderungen.

“Suppliers inform the Saint-Gobain Group of any hazards or risks associated with their products or interventions”

“Die Lieferanten informieren die Saint-Gobain Gruppe über alle Gefahren und Risiken, die durch ihre Produkte oder ihre Arbeiten an Saint-Gobain Standorten entstehen”



Environmental commitment

Umweltschutz

Suppliers and subcontractors implement policies on managing and improving their manufacturing processes, which are designed to limit their environmental footprint throughout the life cycle of the products they supply. In particular, they strive in their respective domains to:

- reduce their impact on ecosystems and biodiversity,
- optimise consumption of natural resources and energy,
- reduce emissions of greenhouse gases, pollutants and volatile organic compounds,
- reduce quantities of waste released and develop recycling and recovery solutions.

They identify and quantify the significant environmental aspects of their activities, products and services. They ensure a traceability of raw materials, components and materials necessary for the provision of services or property. Suppliers shall be duty-bound to Saint-Gobain to disclose any product information required for the Group's Environmental policy to be applied, especially in terms of Carbon Footprint and Life Cycle Assessment. Suppliers and subcontractors encourage the development and distribution of environmentally-friendly technologies and work towards achieving the targets listed above.

Zur Reduzierung der Umweltbelastung während der gesamten Lebensdauer der gelieferten Produkte definieren Lieferanten und Zulieferer entsprechende Richtlinien sowie Maßnahmen, um ihre industriellen Prozesse zu regeln und zu verbessern. Insbesondere umfassen diese Maßnahmen:

- die Reduktion der Auswirkungen auf Ökosysteme und Artenvielfalt,
- die Optimierung des Einsatzes von natürlichen Ressourcen und Energie,
- die Reduktion der Emission von Treibhausgasen, Schadstoffen und flüchtigen organischen Verbindungen,
- die Reduktion der Abfallmenge und die Erarbeitung von Recycling- und Regenerationslösungen.

Sie identifizieren und quantifizieren die wesentlichen Umweltaspekte ihrer Tätigkeiten, Produkte und Services. Sie ermöglichen eine Nachverfolgbarkeit der, für die Dienstleistung oder das Produkt, notwendigen Rohstoffe, Komponenten und Materialien. Lieferanten sind Saint-Gobain gegenüber verpflichtet jegliche Produktinformation bereitzustellen, die notwendig für die Anwendung der Umweltpolitik der Gruppe ist, dies gilt insbesondere für den Kohlenstoffdioxidausstoß und die Ökobilanz. Lieferanten und Subunternehmer unterstützen die Entwicklung und den Einsatz umweltfreundlicher Technologien und arbeiten kontinuierlich an der Erreichung der oben aufgeführten Ziele.

“Suppliers limit their impact on ecosystems and biodiversity”

“Lieferanten minimieren ihre Auswirkungen auf Ökosysteme und die Artenvielfalt”

Legal compliance commitment

Geschäftspraktik – gesetzliche Einhaltung

Suppliers carry on their activities in strict compliance with applicable domestic and international legal standards.

In particular:

- They reject any actions liable to falsify or distort free competition or market access or infringe on the applicable legal rules concerning competition law,
- They reject any form of active or passive corruption in domestic or international transactions,
- They refrain from any practice aimed at interesting, either directly or indirectly, any Saint-Gobain employee with whom they have a business relationship in developing their relations, whether personally or in whatever shape or form.

Suppliers agree to provide only products that comply with national, European and international laws and regulations, as required by the country of distribution.

Suppliers have to be mindful that their own suppliers allow them to fully adhere to the principles detailed in this Charter.

Lieferanten üben ihre Tätigkeit unter strikter Einhaltung der anwendbaren nationalen und internationalen gesetzlichen Standards aus.

Insbesondere:

- untersagen sie Maßnahmen, die zur Fälschung oder Verzerrung des freien Wettbewerbs oder zur Behinderung von Marktzugängen führen oder die die geltende Rechtsprechung zum Wettbewerbsrecht verletzen,
- lehnen sie jegliche Form aktiver oder passiver Korruption bei nationalen oder internationalen Geschäften ab,
- nehmen sie von jeder Praxis Abstand, die direkt oder indirekt zum Ziel hat, Saint-Gobain Mitarbeiter, mit denen sie in Geschäftsbeziehungen stehen, zur eigenen Bevorzugung zu beeinflussen, sei es persönlich oder in welcher Form auch immer.

Die Lieferanten verpflichten sich, nur solche Produkte zu liefern, die den nationalen, europäischen und internationalen Gesetzen und Vorschriften des Landes, in dem sie vertrieben werden, entsprechen.

Die Lieferanten achten darauf, dass sich ihre eigenen Lieferanten so verhalten, dass sie die Prinzipien dieser Charta einhalten können.

“Suppliers carry on their activities in strict compliance with applicable domestic and international legal standards”

“Lieferanten üben ihre Tätigkeit unter strikter Einhaltung der anwendbaren nationalen und internationalen gesetzlichen Standards aus”





HUMAN RIGHTS POLICY

February 2019

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.

OUR APPROACH

We are signatories of the United Nations Global Compact. Our Principles of Conduct and Action explicitly refer to the relevant International Labour Organisation conventions, the OECD Guidelines for Multinational Enterprises, the OECD Anti-Bribery Convention and the International Bill of Human Rights. We have committed to respecting the United Nations' Guiding Principles on Business and Human Rights.

Our Principles of Action in particular make direct reference to them: respect for the law, caring for the environment and respect for employees' rights.

Where these international standards differ from national laws or local norms, we respect local regulations while working to apply international human rights standards as comprehensively as possible.

The implementation of these commitments is based on our Principles of Conduct, both individual and collective, which form the second and complementary set of our values: respect for people, integrity, loyalty and solidarity.

Human rights due diligence through the identification of risks related directly or indirectly to our operations, allows for the most appropriate management of potential or existing negative impacts depending on the countries where we are present or where our partners are present.

We are aware that human rights risk assessment cannot be frozen in time and that the effective management of potential negative impacts requires a constant and transparent dialogue with the stakeholders involved.

“ON-BOARDING” HUMAN RIGHTS

We have identified key human rights areas of application, which are listed below. These areas represent potential risks of problem areas.

The risks of problem areas identified during the due diligence process relate to:

- ▶ **Employees’ rights :**
 - Forced labour
 - Child labour
 - Freedom of association
 - Use of recruitment agencies
 - Non-Discrimination
- ▶ **Health and safety**
- ▶ **The environment**
- ▶ **The fight against corruption.**

In some countries, where the safety of individuals is an ongoing concern, the risks associated with the use of armed security forces are also taken into account.

Risks related to health and safety, the environment and the fight against corruption are addressed through specific policies.

All these risks of problem areas are taken into account in the Principles of Conduct and Action. The EHS and responsible development departments have accordingly set up training programs for our employees to ensure that everyone understands them and that they are effectively implemented by those responsible for managing the relevant operations. Some of these programs may be open to partners, particularly suppliers and subcontractors who have signed the Responsible Purchasing Charter.

GOVERNANCE AND STAKEHOLDER DIALOGUE

This policy is presented by the Chairman and Chief Executive Officer to the Board of Directors. It is based on a principle of due diligence, which involves a methodology itself subject to a process of continuous improvement. It is therefore subject to revision from time to time as necessary.

The General Secretary, in charge of Corporate Social Responsibility, oversees the respect of human rights within the Group.



Each Country CEO is responsible for ensuring compliance with and promotion of the Principles of Conduct and Action in the country/countries under his/her responsibility. He/she is also in charge of implementing the human rights policy for our activities and local partners.

The measures implemented within the framework of Responsible Purchasing take into account human rights risks. The Group's Purchasing Department is responsible for their implementation.

A professional alert system is in place to collect reports of negative impacts. A specific policy on the management of such alerts has been published.

We are committed to training our most exposed employees and managers in the identification and management of risk situations in an open dialogue with potentially impacted stakeholders.

We are committed to communicating our progress and challenges in a regular and transparent manner.