Ethics and Compliance Program *at a glance*

June 2026

The **Principles of Conduct and Action** are the **Saint-Gobain's Code of Ethics** and **the base of its Ethics and Compliance program**, providing **a compass to make the right choices**.

This program is structured around **4 key topics** (policies accessible here):

COMPETITION LAW

All employees must comply with competition law policy.
Anti-competitive agreements or behaviour are prohibited. Meetings with **competitors** (particularly in the context of professional associations or industry forums) are **high-risk situations** that must be closely monitored (agenda and minutes are mandatory).

FIGHT AGAINST CORRUPTION

Any form of corruption, whether direct or through third parties (agents, consultants, etc.), **is strictly prohibited**.
All employees are required to follow the rules set out in the anti-corruption policy in order to prevent the risk of corruption, both with public and private actors.

ECONOMIC SANCTIONS AND EXPORT CONTROL

The **Trade Compliance policy** sets out **guidelines** on embargoes, economic sanctions and export controls **to secure transactions worldwide**.

DATA PROTECTION

The golden rules that every employee must follow when processing personal data are described in the Personal Data Protection Policy.
It ensures compliance with personal data protection for all stakeholders (customers, employees, suppliers, etc.).

And is based in particular on **the following procedures** (accessible here):

Commercial agents and other sales-related intermediaries

Due Diligence must be carried out before working with agents or other sales intermediaries, as well as during the business relationship, as explained in the applicable procedure.

Gifts and Invitations

This procedure sets out the circumstances and conditions under which employees may offer or receive gifts, invitations or hospitality. Gifts exceeding a certain threshold must be declared and approved by the manager in the Disclosure Portal (accessible here).

Managing Conflicts of Interest

This procedure describes how to identify, report, assess and manage conflicts of interest. Potential conflicts of interest must be reported in the Disclosure Portal (accessible here).

Sponsorship and Philanthropy

This procedure describes how to report any donations, patronage or sponsorship operations that fall outside the scope of the entity's usual activities. These activities must be reported and authorised in the Disclosure Portal (accessible here).

MANDATORY TRAININGS

The essential rules of **Competition Law**, **Anti-Corruption** and **Data Protection** are covered in **mandatory training courses** (COMPLY, ACT, and Data Protection in a nutshell) available on the BOOST training platform.
Training courses are also regularly provided to Saint-Gobain employees when needed.

ETHICS AND COMPLIANCE NETWORK

A **network of Ethics and Compliance Officers** will help you understand and apply the rules relating to this programme. They are responsible for **promoting** and **adapting** the programme to the risks in their Region, Cluster or Country, where necessary. List accessible here.

SPEAKUP !

SpeakUp is the Group's **whistleblowing system** (accessible here). It allows anyone to report any violation of the Principles of Conduct and Action or the law, **confidentially** or **anonymously**. The SpeakUp! Whistleblowing Policy details the measures taken **to protect whistleblowers** from potential reprisals, as well as the steps to follow in the event of an investigation. Alert Policy accessible here.