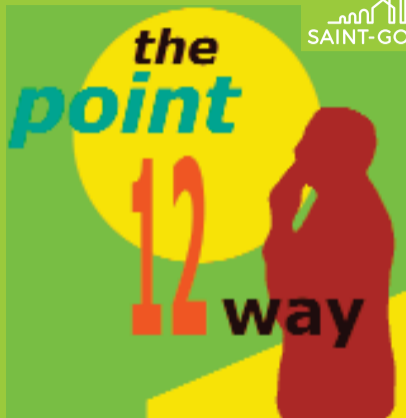


ACT

THE SAINT-GOBAIN INDIA
WHISTLE BLOWER POLICY



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Q1 Why do we need a Whistle Blower Policy?

Saint-Gobain expects all its employees to follow the Principles of Conduct and Action. In India, we have issued a Code of Conduct for employees; this Code of Conduct elaborates on the Principles of Conduct and Action.

The Whistle Blower (WB) Policy provides a secure framework, within which, the Group's employees in India can play an important role in upholding the Principles and the Code of Conduct.

The WB Policy encourages employees of SG Companies in India to report unethical or improper practices or acts, in particular, or violations of the Code of Conduct, in general.

The WB Policy protects employees who, in good faith, report such things from any adverse action against them.

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Q2 What should be reported under the Whistle Blower Policy?

Under the WB Policy, every employee of the Group in India is expected to promptly report to the WB Committee (Delegation/Company) any actual or possible violation of:

- **The Saint-Gobain Principles of Conduct and Action.**
- **The Code of Conduct for Employees.**
- **Any unlawful, unethical or improper activity.**

concerning any Saint-Gobain Business in India.

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Q3 Who are the members of the WB Committee?

The Delegation WB Committee has the following members:

Anand Mahajan, General Delegate

Deepak Chindarkar, Vice President, Finance & IT, India Delegation

K. Visweswaran, Head-Taxation, Legal and Compliance, India Delegation

Each SG India Company's WB Committee typically comprises of the Managing Director, the Head of Finance and the Head of HR.

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Q4. What, when and how should I report?

If you have any information of any wrongful act or any improper activity, you should report it. Please be completely open and candid in your communication.

You should make a report as soon as possible, but, in any case, not later than 60 days of becoming aware of what you intend to disclose.

You can send a written report or an e-mail or speak (on the phone or face-to-face) to any or some or all the members of the WB Committees of the Delegation or the relevant company.

Please note that you can also directly speak with Mr. Anand Mahajan, General Delegate of Saint-Gobain for India, (Tel: 022 40212151). The WB Committee contact list is located on the last page.

Please note that intentionally filing a false report will be considered a wrongful act. In this case, the employee will not be protected and action may be taken against him or her.

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Q5 In what format should the disclosure be made?

There is no particular format. As indicated earlier, the disclosure may be made in writing (by e-mail or on paper) or orally (a personal meeting or over the telephone).

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Q6 Do I need to investigate the matter on my own before reporting it?

No. You are neither expected to nor are you required to conduct investigations or obtain evidence. However, if you have come across any evidence, you should submit it along with your report.

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Q7 Can I report something anonymously?

Yes. You can report anonymously. However, if you choose to report something anonymously, then you should provide sufficient evidence to justify the commencement of an investigation. Needless to say, you should have no fear of revealing your identity and are encouraged to do so.

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Q8 Will my identity be disclosed to the person targeted by the report?

Your identity will not be disclosed, except if required under the law or if this is required for the purpose of the investigation. However if you choose to disclose your identity on your own, then there will be no obligation on the part of the WB Committee to keep your identity confidential.

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Q9 How am I protected against retaliation from the party against whom I am making a complaint or any other affected party?

As per the WB Policy, no executive of the company shall take or recommend an adverse personnel action against an employee in knowing retaliation for a disclosure of information about an alleged wrongful conduct or act.

Your right to protection does not, however, extend to immunity from disciplinary action for involvement in matters that are the subject of the allegations or an ensuing investigation, or any other misconduct or wrong doing.

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Q10 If I make a disclosure under the WB Policy, do I become immune from all adverse personnel actions?

No. This policy cannot be used as a defense by an employee against whom an adverse personnel action has been taken for legitimate reasons under the Company's rules and policies.

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Q11 If I feel that I have been subjected to an adverse personnel action as a consequence of being a Whistle Blower, what do I do?

If you feel you have been subjected to an adverse personnel action, you can report it by making a written WB Complaint to any member of the Committee (Delegation or Company) within 30 days of such action.

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Q12 By when can I, as a Whistle Blower, expect the Committee to act on my complaint of unfair adverse personnel action?

In the normal course, the Committee will arrive at a conclusion and decide on a course of action well within 60 days of receiving the complaint.

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CONTACT



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