

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.

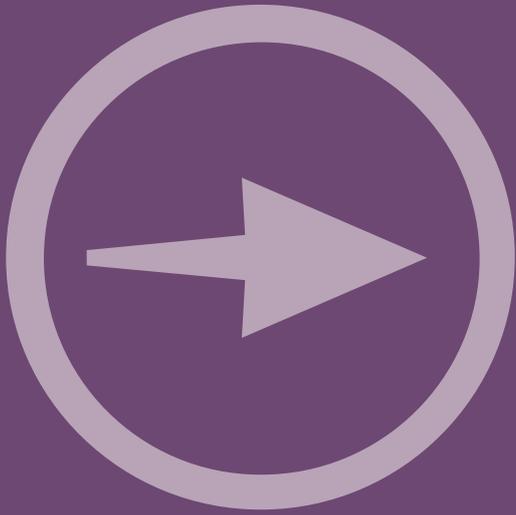
Today the Group wishes to give written expression to these principles, to help us communicate them and reinforce their implementation throughout the Group worldwide.

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.



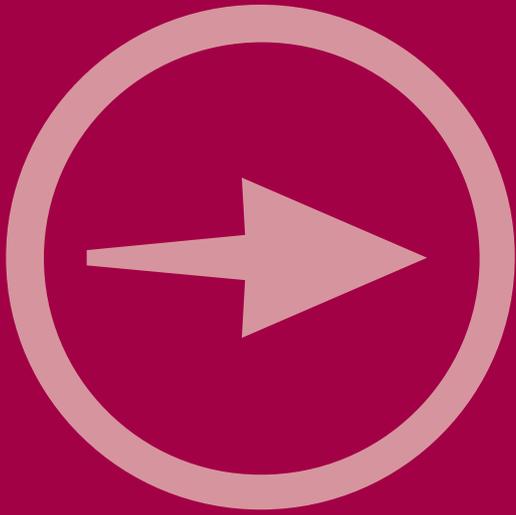
Loyalty

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