




Doing the Right Thing

Code of Ethics and Business Conduct Guidelines for North America



Table of Contents

	3	Message from the President
Our Values	6	Principles of Conduct
	7	Principles of Action
Our Roles and Responsibilities	8	Working With the Code
	10	As Employees
		As Managers
		Compliance and Discipline
		Applying the Code in Other Countries
		Compliance by Outside Partners
	11	Reporting Concerns and Violations
		Protection from Retaliation
		Ethics Hotline
Respecting Each Other	12	Ensuring a Safe, Healthy and Respectful Workplace
	14	Preventing Discrimination and Harassment
	15	Creating a Safe and Healthy Workplace
		Preventing Workplace Threats and Violence
		Ensuring Product Quality and Safety
		Protecting the Environment
		Alcohol, Drug and Tobacco Use
Working With Integrity	16	Avoiding Conflicts of Interest
	18	Outside Employment
		Non-Company Service and Income
		Business and Investment Opportunities
		Business Gifts
	20	Protecting Our Assets and Information
		Fraud and Misuse of Company Property
	21	Maintaining Honest and Accurate Records
Complying With the Law	22	Supporting Fair Trade, Competition and the Political Process
		Antitrust Laws
		Competitor Information
	24	Insider Information and Trading
		Corruption, Bribery and Other Illegal or Unethical Payments
		Government Contracts
		International Trade and Export Control
		Foreign Economic Boycotts
	25	Participating in Political Activities
Following Sound Business Practices	26	Protecting Our Information and Image
		Confidential Business Information
	28	Safeguarding Privacy
		Using Social Media



Picture yourself driving down an open road in the middle of nowhere. No one is around for miles. You come to a crossroads with a traffic light. The light is red.

What do you do?

Do you stop and wait for the light to turn green, because it's the law, a safety issue and the right thing to do? Or do you drive through the red light, because nobody's there to see you do it?

Ethics are what you do when *nobody's* looking.

Every day, we're confronted with a host of decisions in our personal and professional lives. Some of the choices are cut and dried, while others are more complex.

How we make these decisions is determined by our ethics — the core moral, ethical and legal values that guide us in our daily activities.

As Saint-Gobain employees, we own the reputation of our Company, and it is fueled by our positive ethical behaviors. By applying our values to our conduct and actions, we have the power to enhance our reputation as an honest and trusted business partner.

The Saint-Gobain *North America Code of Ethics and Business Conduct Guidelines* sets the standards for how we conduct ourselves in the workplace, and in our relationships with our colleagues, customers, suppliers and competitors. It provides the framework for making solid ethical decisions — no matter what the situation or who is watching.

We want you to feel confident when making these choices, so that whenever you come to a crossroads in your business life, you'll instinctively **stop, think and act** according to our high ethical standards — not just because *it's the right thing to do*, but because *it is the Saint-Gobain thing to do*.

Our Values



Principles are guidelines for human conduct that are proven to have enduring, permanent value.

— Stephen Covey



Saint-Gobain businesses around the world operate under a shared set of values — our Principles of Conduct and Action. These principles guide us in our daily operations and are the foundation for how we do business. As employees, we are each personally responsible for adhering to these principles and ensuring our actions are consistent with Saint-Gobain's high ethical standards.

Principles of Conduct

Professional commitment

means mobilizing 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.

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.

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 favor 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.

Principles of Action

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.

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.

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.

 **Read more:** [Saint-Gobain Group Compliance Program](#)

Solidarity

is based on a sense of individual responsibility at work, which prevails over self-centered thinking. It encourages teamwork 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.

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 labor, compulsory labor, or child labor — 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.

Our Roles and Responsibilities



*Circumstances are beyond
human control, but our conduct
is in our own power.*

— Benjamin Disraeli



Working With the Code

Saint-Gobain's Code of Ethics and Business Conduct Guidelines ("the Code") outlines the ethical and legal principles that must guide each of us in our work. These standards reinforce Saint-Gobain's commitment to our core values of honesty and integrity and provide a framework for expected behavior as Company employees towards one another as well as our customers, partners and competitors.

The Code applies to all directors, officers, employees and agents of Saint-Gobain Corporation, its subsidiaries and controlled affiliates, regardless of location.

Keep in mind that no guidelines can cover every ethical or legal situation that may arise, and this Code is not intended to provide the final answers for all situations. Fortunately, you are not alone in asking yourself, "What is the right thing to do?" If you encounter ethical or legal questions or issues and are unsure of the best course of action, consult your manager or business leader for guidance.

At the beginning of your employment and periodically throughout your tenure with the Company, you will be required to confirm that you have read the Code and understand that compliance with the Code is a condition of your continued employment with Saint-Gobain.

If you have questions regarding interpretation of the Code, please contact the Vice President, Business Practices and Compliance Programs, at complianceprograms@saint-gobain.com.

Additional information, including the full policies referenced in this brochure, FAQs and hypothetical scenarios, can be found on the Saint-Gobain North America intranet, under [Business Practices and Compliance](#).



Emil believes that a co-worker may have violated the Code by submitting a false expense report. However, he doesn't have actual proof.

Should Emil report his suspicion?

Emil is required to report any known or suspected violations of the Code, regardless of whether it turns out to be an actual violation.

As Employees

As Saint-Gobain employees, we all share in the responsibility for maintaining the highest ethical standards to preserve the integrity of the Company and how we are perceived by various audiences — including our colleagues, customers, suppliers, competitors and communities. No matter where we live or work, each of us is individually responsible for following the policies and laws outlined in the Code and reporting any known or suspected violations.

As an employee, you have a responsibility to:

- Read and understand the policies, procedures and laws that apply to your work
- Comply with the Code and the law
- Ask questions if you're unsure or need guidance in a particular situation
- Report any known or suspected violations of the Code
- Ensure that all Company agents under your supervision receive a copy of, and abide by, the Code

As Managers

Managers and supervisors have a special responsibility to lead by example and to support compliance with the Code among their teams. No supervisor has the authority to require or permit conduct that is in violation of the Code or any law.

As a manager, you must also:

- Communicate Saint-Gobain policies regarding ethical behavior to employees
- Ensure that the standards are followed and any potential violations are reported promptly
- Create a supportive environment where employees are free to engage in open and honest discussion about violations without fear of retaliation
- Report any known or suspected Code violations by a member of their team or by anyone else in the Company
- Promote adherence to the Code by ensuring ongoing employee communication, guidance and training
- Any employee who retaliates, directly or indirectly, against an employee who reports a violation
- Any employee who knowingly falsely accuses another employee of a violation

Compliance and Discipline

Compliance with the Code is a requirement of continued employment with Saint-Gobain. When your daily work is consistent with these provisions and policies, you are helping sustain our commitment to a culture of legal and ethical behavior at all levels of the Company and in every corner of our operations. The principles outlined in the Code reflect our core values and therefore have the unwavering commitment and support of the Company's senior leadership.

Violations of any of the policies outlined in the Code will result in disciplinary action, ranging from a reprimand to dismissal.

Disciplinary action will be taken against

- Any employee who fails to cooperate or interferes with an investigation conducted or sanctioned by the company
- Any employee who violates the Code, Company policy or the law
- Any employee who deliberately withholds pertinent information concerning a violation
- Any manager or supervisor, if involved or aware of the violation without reporting it, or who misreports a violation

Applying the Code in Other Countries

Each of the countries in which Saint-Gobain conducts business has its own set of laws and regulations. In some countries, business practices may be less stringent or different from Saint-Gobain's practices in North America. When doing business in other countries, you should follow the Code. For additional guidance on applying the Code internationally, contact the Vice President, Business Practices and Compliance Programs.

Compliance by Outside Partners

Outside contractors, business partners and suppliers are expected to abide by these same ethical standards when working with Saint-Gobain. Please make sure any outside partners you work with are familiar with, and abide by, the Code.

Reporting Concerns and Violations

Saint-Gobain counts on each of us to support the Company's commitment to ethical behavior. If you know of, have heard of, or reasonably suspect a possible violation of the law, a Company policy or this Code, you must report it immediately. Saint-Gobain will ensure that any allegations are investigated and handled in the strictest confidence.

To report any concern or violation of the Code, contact:

- Your manager or supervisor
- Your Human Resources representative
- Your business unit general manager
- Your group or division officer
- Vice President, Business Practices and Compliance Programs
- General Counsel
- General Auditor, Internal Control Services

As Employees

If you feel uncomfortable reporting known or suspected violations to one of the individuals listed above, you may report your concern anonymously through the Saint-Gobain Ethics Hotline. The Hotline offers each of us a voice in sustaining the Company's culture of ethics and safety by providing a confidential outlet to express ethical concerns or problems. Your confidentiality will be protected to every extent possible subject to applicable laws, regulations or legal proceedings.

Saint-Gobain Ethics Hotline



800-548-2088
610-893-5138



U.S.: group-compliance-alert-us
Canada: group-compliance-alert-ca
(accessible only through the Saint-Gobain internal email system)

Respecting Each Other



*Respect for ourselves guides
our morals; respect for others
guides our manners.*

— Laurence Sterne



Ensuring a Safe, Healthy and Respectful Workplace

Respect for others is one of our most fundamental values. Saint-Gobain strives to uphold high standards and values in the workplace by following all applicable Equal Employment Opportunity laws and industry best practices. This includes a commitment to fairness and equal opportunity in hiring, assigning, evaluating and promoting our employees in an environment free of discrimination. We must each do our part to support the Company's commitment to maintaining a safe, healthy and respectful workplace, being mindful of our actions and how we treat others in our daily activities.

This commitment means more than just following the letter of the law. In the course of business, you are expected to engage with others in a spirit of courtesy, dignity and mutual respect at all times. Bullying, abuse, intimidation, hostility and other threatening behavior is inconsistent with our culture and values and will not be permitted. If you encounter situations in which you feel you or someone else is not being treated appropriately, notify your manager, your Human Resources representative or the Law Department.

If you are in a supervisory, management or other leadership position, you have a special responsibility to keep a close eye on our Company's culture of respect, dignity, health and safety and to ensure that our standards and legal responsibilities are maintained across the board. If an employee brings a harassment or discrimination concern to your attention, you are required to address the situation in a timely and appropriate manner. This could include raising it further with your management and with the respective corporate Human Resources and Law Departments as necessary to ensure an outcome in line with Saint-Gobain's high standards and full compliance with the law.



Karen's co-worker, Tom, tells inappropriate jokes at work that make Karen feel uncomfortable. When she mentions this to Tom, he tells her to stop being so sensitive and continues telling the jokes. Karen then notifies her manager, but her manager tells Karen to cut Tom some slack since he's the top salesman for their business.

What should Karen do?

Karen did the right thing by trying to resolve the issue with Tom directly and then discussing it with her manager. Karen's manager is obligated to report Tom's behavior, even if he is one of the Company's top performers. Karen should report her concern to any of the following resources: her Human Resources representative, the Vice President of Business Practices and Compliance Programs, the Law Department, or the Ethics Hotline. Tom's disrespectful conduct creates a hostile environment and will not be tolerated.

Preventing Discrimination and Harassment

Saint-Gobain is committed to providing a work environment where each of us is treated with respect and dignity, and without discrimination or harassment. We encourage and support mutual respect in the workplace and expect all employees to behave in a professional manner. Each of us is responsible for ensuring that our comments and actions are appropriate and respectful, whether we're dealing with a customer or a colleague, a subordinate or a supplier.

Harassment can be both sexual and nonsexual, and can take many forms — such as abusive or offensive remarks, physical advances and inappropriate jokes or images shared in person or via email (including pornography on Company computers). Attendance at adult entertainment establishments while on Company business contributes to a hostile workplace and is not permitted under any circumstances.

Saint-Gobain does not tolerate discrimination or harassment of any kind — especially discriminatory or harassing behavior based on race, religion, creed, gender, sexual orientation, national origin, age, disability or veteran status.

If you experience or observe discriminatory or harassing behavior, you should address the source in a direct and respectful manner. If your attempt to resolve the issue is unsuccessful, or if you feel uncomfortable confronting the source of the issue, notify your manager or Human Resources representative, or call the Saint-Gobain Ethics Hotline.

 **Read the policies:** [Anti-discrimination, Anti-harassment Policy and Complaint Procedure](#)

[Equal Opportunity and Affirmative Action Statement](#)

[Adult Entertainment Policy](#)

Creating a Safe and Healthy Workplace

At Saint-Gobain, our people are our greatest asset. That's why we make worker health and safety a top priority. Facilities must comply with all environmental, health and safety laws, regulations and procedures. Managers bear direct responsibility for ensuring the safety and health of their employees. Each of us is responsible for our own safety, as well as the safety of our fellow employees.

 **Read the policy:** [EHS Policy](#)

Saint-Gobain Ethics Hotline



800-548-2088
610-893-5138



U.S.: group-compliance-alert-us
Canada: group-compliance-alert-ca
(accessible only through the Saint-Gobain internal email system)

Preventing Workplace Threats and Violence

Saint-Gobain does not tolerate threats or violence in the workplace. This includes verbal threats or intimidation, threatening or menacing behavior, stalking, the possession of weapons, or acts of violence. While we look to our leaders to set an example, we all have a role in establishing a culture of respect and are expected to treat each other with dignity. Threatening behavior and acts of violence are taken very seriously and can result in disciplinary action, up to and including termination, as well as legal action.

 **Read the policy:** [Workplace Violence Policy](#)

Ensuring Product Quality and Safety

Saint-Gobain conducts business with a high regard for the health and safety of the people who use our products. Our employees play a critical role in ensuring that our standards for quality and safety are met at every stage of the product's life cycle — from design and manufacture to delivery and end-of-life disposal. Saint-Gobain is committed to working with government agencies, industry associations and recognized authorities in ensuring the highest standards for the quality and safety of the Company's products.

Protecting the Environment

Caring for the environment is one of our core values. Saint-Gobain is committed to sustainable manufacturing processes throughout our operations. All

Saint-Gobain facilities are responsible for complying with public health and environmental laws and maintaining an open dialogue with their respective government authorities, industry groups and local communities about any potential material hazards.

Alcohol, Drug and Tobacco Use

As part of our efforts to promote a culture of safety and wellness, Saint-Gobain does not allow the use of illegal drugs, marijuana or tobacco on Company property or in Company-owned or leased vehicles. Except for lawful and moderate consumption of alcohol at approved Company events, the use, possession, sale or distribution of these substances on Company property is prohibited. Illegal use of drugs off premises and off duty is also prohibited. Any employee who reports to work under the influence of drugs or alcohol will be in violation of this policy and will be subject to disciplinary action.

 **Read the policy:** [Alcohol and Drug Abuse Policy](#)
[Tobacco Use Policy](#)

Working With Integrity



*Integrity is the essence
of everything successful.*

— R. Buckminster Fuller



Avoiding Conflicts of Interest

Saint-Gobain expects each of us to act in the best interests of the Company. A conflict of interest occurs when your personal interests or activities conflict with, or appear to conflict with, your responsibilities at Saint-Gobain. Any existing or potential conflicts of interest must be reported.

Saint-Gobain directors, officers, employees and immediate family members must avoid any activity that could present, or gives the appearance of, a conflict of interest with the Company.

Without prior disclosure and approval from Saint-Gobain, you must never:

Loan money to, or borrow money from, individuals or organizations that do business with or compete with Saint-Gobain, except for transactions with banks and other financial institutions as part of normal business practice

- Benefit personally from any purchase or sale of goods or services to Saint-Gobain, including the sale or lease of real or personal property
- Hold any direct or indirect interest in an outside enterprise that competes with Saint-Gobain or has current or prospective business with the Company
- Work for or provide services to, partner with or invest in the business of a customer, supplier or competitor of Saint-Gobain or a customer's customer

Disclosing a Conflict of Interest

At the start of employment and throughout your career with Saint-Gobain, you are required to disclose any conflicts of interest by completing and signing a [Conflict of Interest Disclosure Form](#).

Certain outside activities require the prior written approval of the Company, including your senior business unit manager and either the Vice President of Business Practices and Compliance Programs or the General Counsel. If you have difficulty determining whether a situation could be viewed as a conflict of interest, please consult your manager for guidance. When in doubt, you should fully disclose the proposed activity before you begin.



During a hectic business trip, Cathy's busy schedule forced her to miss a dinner for which she would have been eligible for reimbursement. When she got home, Cathy picked up takeout for herself and her husband, charging it to her Company card as an "Employee Business Meal." Since the takeout food was less expensive than the dinner she felt she was "owed," Cathy rationalized that this was acceptable since the Company ultimately came out ahead on the cost.

Did Cathy follow the Code?

Cathy's actions were unethical. Her business trip was over. Falsely reporting the details of the meal on her expense report by omitting key information was a further violation of the Company's ethics standards. environment and will not be tolerated.

- Use or permit others to use Saint-Gobain employees, property, facilities, resources, materials or equipment for personal gain of any kind
- Take advantage of any business or investment opportunity as a result of your relationship with Saint-Gobain

Outside Employment

Your position with Saint-Gobain should be your primary form of employment. Any outside work or other source of income presents a potential conflict of interest. This employment must be secondary and not interfere in any way with your duties as a Saint-Gobain employee, and must be disclosed to the Company. At its sole discretion, Saint-Gobain will determine whether the proposed outside employment is in conflict with the Code.

Non-Company Service and Income

Unless disclosed to and approved by the CEO of the Company, no Saint-Gobain director, officer, group or division president or vice president, or business unit general manager may serve as an officer, director, employee, partner, trustee or consultant for any for-profit enterprise other than the Company, nor may they receive salary, fees, dividends or other outside income (except dividends and interest from publicly traded securities or other similar investments).

Business and Investment Opportunities

During your employment, you may become aware of business or investment opportunities in which the Company has an interest. You may not take direct or indirect advantage of such opportunities for personal gain, except when the opportunity has been presented to the Company for consideration and declined, and provided the activity is in line with the Company's policies on outside income and employment.

Business Gifts

In the course of conducting business with customers, vendors and other contacts, giving and receiving gifts is a customary practice that, when done ethically, can strengthen working relationships. Business entertainment such as sporting events and dinners can offer appropriate opportunities to discuss, plan or advance projects of mutual interest. Saint-Gobain encourages these practices in the appropriate time, place and context.

To maintain the highest standards of integrity in our business dealings, gifts and entertainment must be kept within the bounds of common sense, good judgment and moderation. Any gifts or entertainment that create a sense of obligation or even the appearance of corruption, bribery or conflict of interest can create a legal risk for you and the Company or damage the Company's reputation and must be strictly avoided.

Alyssa, a plant HR manager, is responsible for hiring an outside company that handles the cleaning at her facility. Just before the holidays, the owner of the cleaning company sends Alyssa two tickets to a local college football game to thank her for the business.

Can Alyssa accept the tickets?

While modest business entertainment and occasional nominal gifts from vendors can be appropriate in certain circumstances, in this case the tickets serve no business purpose. Moreover, in her role in managing the vendor relationships, Alyssa is acting as a purchasing agent for the Company and is therefore prohibited from accepting any gifts from this vendor, regardless of the amount.

As Employees

You must never engage in giving or receiving business gifts or entertainment that could be construed as lavish or extravagant. Gifts may not be solicited and must always have a valid business purpose connected to a specific event or operation. Gifts in the form of cash or cash equivalent, such as gift cards that can be converted into cash, are never permitted.

Keep the following guidelines in mind when giving and accepting business gifts or entertainment:

Giving Gifts

- Cannot exceed nominal value (\$25 or less).
- OR
- Must be a Company-branded item selected and purchased in accordance with the business gift policy.

Entertaining Business Guests

- Cannot exceed \$500 per person for each event, except with prior corporate approval.
- Must be related to a clearly defined business event.
- Cannot influence or oblige the recipient in any way.

Accepting Gifts

- Except for branded or promotional items, business meals or business entertainment, all gifts must be pooled and shared with your colleagues in your department or work area.
- You may not accept gifts from suppliers during the request for proposal or negotiation phases, or after a work project has been launched.

Accepting Business Entertainment

- Requires supervisor's prior approval for travel to entertainment events.
- Cannot exceed \$500 per person for each event, except with prior corporate approval.
- May not use customer or supplier property, airplane transportation or trips without the prior approval of your operating division president, or the Chief Executive Officer in the case of corporate vice presidents and members of the Board of Directors.

These are minimum requirements. Departments involved in purchasing goods or services are encouraged to set their own, more restrictive gift rules. The Business Gifts Policy outlines the steps to follow for obtaining any corporate approvals or exceptions to the above. Keep the policy close at hand and refer to it often.

Saint-Gobain has set clear policies for the types and circumstances of business gifts and entertainment that are permissible. Please read these documents carefully and refer to them for direction on acceptable practices when giving or receiving gifts. If you are still unsure whether a gift is acceptable, contact your manager or the Compliance Department for guidance.

 **Read the policy:** [Business Gifts Policy](#)

[Gift Rules for Saint-Gobain Suppliers,
Purchasing Managers and Buyers](#)

[Gifts and Hospitality Policy](#)

Protecting Our Assets and Information

Fraud and Misuse of Company Property

Saint-Gobain counts on each of us to protect our assets against theft or misuse. Every day, we are entrusted with Company resources ranging from office supplies and shop tools to Company-leased vehicles and laptop computers. We are also responsible for financial resources, such as corporate credit cards, and when making purchasing decisions on the Company's behalf. Saint-Gobain trusts us to use these resources wisely and to exercise only the highest ethical decision making at all times.

Fraud — defined as any attempt to cheat, trick, steal, deceive or lie — is not only a violation of the Code, but also a potentially criminal act. Fraud will not be tolerated, regardless of the dollar amount or the position or seniority of the employee involved.

Examples of fraudulent activity include:

- All forms of embezzlement and theft of the Company's physical or financial assets
- Submitting false or misleading expense reports, even if the amounts involved are nominal
- Using Company credit cards for personal use
- Forging or altering checks
- Taking or selling Company property without permission, including scrap or waste material
- Unauthorized handling or reporting of Company funds or property

Saint-Gobain takes fraud prevention seriously and has instituted an extensive system of internal controls — including policies, financial assurances, audits, and investigative and enforcement protocols.

The Company relies on us to fully support its fraud prevention efforts by avoiding the pitfalls that lead to an erosion of ethics. Don't rationalize unethical choices, however slight they may appear to be. If you submit

an expense report, make sure it's accurate, truthful and detailed. When audited or otherwise called on to account for the use of Company resources, demonstrate your commitment to the process through rapid follow-up and support.

We look to our leaders to firmly sustain the Company's auditing and accounting mandate and to ensure the commitment and support for these important principles from members of their respective teams.

 **Read the policy:** [Corporate Expense Card Policy](#)

Josh is a plant supervisor who decides to borrow his facility's backhoe over the weekend for a water main project at his home. Josh asks Brian, the plant's backhoe operator and one of Josh's subordinates, to do the work on a private contract.

Should Brian do the work?

The private use of both Company equipment and personnel is prohibited. Despite the fact that the request was made by his supervisor, Brian should not use Company property for outside work under any circumstances. Brian should report Josh's request to his Human Resources representative or the Ethics Hotline.

Maintaining Honest and Accurate Records

As employees, we all share responsibility for ensuring that our Company records are truthful, reliable and in compliance with U.S. law. This includes all laws, regulations and policies related to data integrity and reporting, as well as the United States Foreign Corrupt Practices Act. The Act prohibits payments or offers of payments of anything of value to foreign officials, political parties or candidates for foreign political office in order to secure, retain or direct business. The Act also contains significant internal accounting control and record keeping requirements that apply to the Company's domestic operations.

Information must be recorded accurately and honestly in all business documents, including:

- Expense reports
- Logs
- Product data
- Research and test results
- Revenue and costs
- Sales projections
- Incident and safety reports
- Purchase orders
- Time sheets

Dishonest reporting of any kind inside or outside the Company, including reporting or organizing information in an attempt to mislead or misinform, is a direct violation of the Code and will not be tolerated.

You may not:

- Make any entry on the Company's books and records that intentionally hides or disguises the true nature of any transaction
- Establish for any purpose an unauthorized, undisclosed or unrecorded fund or asset involving the Company's money or other assets
- Allow transactions with a supplier, agent, customer or other third party to be structured or recorded in a way that is not consistent with generally accepted business practices

Eric, a quality assurance manager, discovers that his plant's product does not meet the specifications required by his largest customer.

In an effort to protect the Company from the potential loss of business, Eric decides to alter some of the data on the next quality inspection report.

Did Eric do the right thing?

Even though Eric thought he was acting in the best interest of the Company, his actions are a clear and unacceptable violation of the Code.

Saint-Gobain Ethics Hotline



800-548-2088
610-893-5138



U.S.: group-compliance-alert-us
Canada: group-compliance-alert-ca
(accessible only through the Saint-Gobain internal email system)

Complying With the Law



*Remember upon
the conduct of each depends
the fate of all.*

— Alexander the Great



Protecting Our Assets and Information

Saint-Gobain is committed to open and fair competition in the marketplace. As part of this commitment, we comply with all applicable laws wherever we conduct business. Our high ethical and legal standards also apply to our participation in the political process, where we uphold the letter and spirit of all laws related to our involvement in issues that affect our operations.

Antitrust Laws

Antitrust laws are designed to ensure a fair market system. Saint-Gobain is committed to free and open competition in the marketplace and requires that all of us adhere to the letter and the spirit of these laws. Activities such as price fixing, boycotting suppliers or customers, discriminatory sales, and illegal agreements with competitors are all violations of the antitrust laws.


These laws are complex and difficult to interpret, and apply to a broad range of corporate activities. You should contact the Law Department prior to taking action on any questionable matters.

 **Read the policy:** [Saint-Gobain Antitrust Compliance Policy](#)

Competitor Information

Gathering information about competitors helps Saint-Gobain gain a better understanding of the markets in which we do business. With prior consultation from the Law Department, gathering publicly available information through legal and ethical means — such as surveys, market studies, advertisements, discussions with customers, competitive analyses and benchmarking — can be beneficial to the Company.

Acquiring a competitor's trade secrets or other proprietary or confidential information through unlawful or unethical means such as theft, spying, misrepresentation and disclosures by the competitor's present or former employees is strictly prohibited. Consult with the Vice President, Business Practices and Compliance Programs or the General Counsel for guidance on gathering competitor information that is not from an open source.

A photograph of two men in business attire. The man on the left is standing, wearing a white dress shirt and a grey striped tie, smiling as he looks down at a document. The man on the right is sitting at a desk, wearing a light blue dress shirt and a grey striped tie, looking at the same document with a thoughtful expression, his hand resting on his chin. The background shows a bright office environment with large windows.

Jason, a sales representative, has been trying to secure a lucrative contract with a potential customer. During a break at a trade show, the customer invites Jason to an informal discussion with a competitor about pricing. Jason is worried that he'll jeopardize the opportunity to gain the customer's business if he doesn't join in the conversation.

What should Jason do?

Discussing price with a competitor in any situation is a violation of antitrust laws. Even though Jason believes earning the customer's business would benefit the Company, he must stop any discussion on price immediately and clearly state that Saint-Gobain does not engage in discussions on price. Jason should then report the incident to Saint-Gobain's Law Department.

Insider Information and Trading

While working at Saint-Gobain, you may learn confidential information about our company, suppliers or business partners. Insider information is information that has not been made public and has the potential to influence an investor to buy, sell, or hold stock or securities in a company. Insider trading occurs when someone buys or sells a publically listed company's securities using insider information. You may not use insider information for personal gain or pass along this information to anyone else. It is a violation of the Code and against the law.

Corruption, Bribery and Other Illegal or Unethical Payments

As a responsible member of the international business community, Saint-Gobain does not tolerate bribery in any form. You are strictly prohibited from soliciting or accepting bribes, gifts or anything of value in exchange for business, whether directly or indirectly.

 **Read the policy:** [Group Memo on Bribery and Corruption](#)

Government Contracts

When contracting with the U.S. government, the standards of conduct may be different from those of commercial business practice. Saint-Gobain is legally responsible for handling these contracts in a manner that fully complies with the unique rules and regulations while abiding by the standards set forth in the Code. If your job involves working with government contracts, please refer to the policy for complete details.

 **Read the policy:** [Government Programs](#)

International Trade and Export Control

Saint-Gobain and our employees are required to comply with national and international laws controlling the import and export of products, services and technology, as well as foreign transactions conducted abroad. If you are involved in exporting or processing orders for export, please refer to the policy for full details.

 **Read the policy:** [Export Control and Compliance Program](#)

Foreign Economic Boycotts

Saint-Gobain is required to comply with all U.S. laws and regulations relating to foreign economic boycotts. Because boycott-related requests are often difficult to recognize, it is important for anyone involved in international transactions to read and understand our policy.

 **Read the policy:** [Export Control and Compliance Program](#)

Do's and Don'ts of Antitrust Compliance

- **Don't** discuss pricing with competitors. Never attend a meeting at which pricing will be discussed. If the subject of pricing comes up, voice your protest and leave immediately.
- **Don't** discuss, exchange or share competitively sensitive data with competitors.
- **Don't** discuss dividing or allocating customers, markets or territories with a competitor.
- **Don't** restrict the resale activity of a customer or attempt to control the customer's resale price.
- **Don't** talk to dealers or distributors about the prices they charge for your products.
- **Don't** talk to your customers about other customers.
- **Don't** require a customer to buy exclusively from our company.
- **Don't** require a customer to buy one product to obtain another.
- **Don't** make sales or purchases conditional on reciprocal sales or purchases.
- **Don't** suggest that a purchaser buy from our company because we buy from the purchaser's company.
- **Do** report any actual or suspected antitrust violations or concerns to the Law Department immediately, proposed activity before you begin.

Participating in Political Activities

In order to improve the communities where we live, work and do business, Saint-Gobain participates in the policy making process and engages in dialogue on issues that affect our operations. Saint-Gobain’s lobbying and government affairs activities must align with the Company’s high ethical standards and comply with all applicable laws and regulations.

As a Saint-Gobain employee, you may not make direct or indirect political contributions of any kind on behalf of the Company without the prior approval of the General Counsel. Gifts to elected officials or public servants require the prior approval of your division president and the Vice President of Business Practices and Compliance Programs or the General Counsel, and must be in compliance with all applicable campaign laws and practices.

We encourage you to support the political process and the candidates of your choice. However, you may only participate in these activities on your own time and at your own expense.

 **Read the policy:** [Political Activities Policy](#)

Saint-Gobain Ethics Hotline	
 800-548-2088 610-893-5138	 U.S.: group-compliance-alert-us Canada: group-compliance-alert-ca (accessible only through the Saint-Gobain internal email system)

Following Sound Business Practices



*It takes many good deeds to
build a good reputation, and only
one bad deed to lose it.*

— Benjamin Franklin



Protecting Our Information and Image

In keeping with our culture of mutual respect, Saint-Gobain trusts us to respect the confidentiality of business data and personal information. We are also expected to show the same respect toward the Company's image by using good judgment when using social media.

Confidential Business Information

During your time at Saint-Gobain, you will frequently encounter internal information related to the Company's business activities and plans, including data related to research and innovation. Maintaining the security and confidentiality of this information is a critical driver of our Company's success. You are expected to protect the Company's confidential business and technical information just as you would our physical property.

You may not disclose confidential information outside of the Company, except when authorized to disclose it to suppliers, customers or others who have entered into confidentiality agreements with the Company.

You are also required to protect confidential information provided to Saint-Gobain by our suppliers, partners, customers and others during the performance of contracts, just as you would our own proprietary information. You may not disclose such information unless contractually authorized to do so.

Your responsibility to protect the Company's confidential information remains in effect not only during, but also after your employment with Saint-Gobain ends.

Megan has a strong suspicion that one of her colleagues, Matt, has been using his work computer to visit unauthorized websites. One day while Matt is at lunch, Megan notices that Matt is still logged in to his computer and decides to take a look at the browser history to see what Internet sites Matt's been visiting.

Did Megan do the right thing?

Megan is guilty of snooping, which is strictly prohibited. If Megan has suspicions about Matt's behavior and is acting in good faith, she should report her concern to her manager or the Ethics Hotline, and it will be handled appropriately.



Safeguarding Privacy

In the course of conducting business, Saint-Gobain collects, uses and stores records that contain personally identifiable information. This includes names, birth dates, driver's license numbers, home addresses and Social Security numbers, as well as payroll, credit card and health information. Saint-Gobain employees and other individuals who do business with the Company expect that the Company will handle their personally identifiable information responsibly and that it will take appropriate and effective measures to protect that information from theft, inadvertent disclosure or misuse.

As a Saint-Gobain employee, you must take reasonable and appropriate measures to protect personally identifiable information from unauthorized or improper access, use, processing, storing, disclosure, modification or destruction. Only employees who have a business need to know the information may have access to the data of another employee, a customer, or other third party doing business with the Company.

Snooping, defined as accessing an employee's personal or business data without his or her knowledge, is strictly prohibited without the prior approval from the Vice President of Business Practices and Compliance Programs or the General Counsel. This includes data in both paper and electronic form, such as information on a laptop, desktop or cell phone. You may not access another employee's information without authorization. Anyone caught snooping will be subject to disciplinary action, up to and including termination.

 **Read the policy:** [Personal Data Privacy Policy](#)

Using Social Media

Social media platforms offer a powerful way to engage with customers and build business relationships. These are powerful communication tools with complex implications for business and personal use. You should not post Company logos or images to your personal social media sites without prior approval from your manager.

 **Read the policy:** [Social Media Policy and Best Practices](#)

Saint-Gobain Ethics Hotline



800-548-2088
610-893-5138



U.S.: group-compliance-alert-us
Canada: group-compliance-alert-ca
(accessible only through the Saint-Gobain internal email system)

“

*Ethics is knowing the difference
between what you have a right
to do and what is right to do.*

— Potter Stewart

”

Making Ethical Decisions

Ethical issues are not always black and white. If you're unsure about a situation, ask yourself the following questions before making a decision:

- Is it legal?
- Is it the right thing to do?
- Is it consistent with Saint-Gobain policies and our Principles of Conduct and Action?
- Could it reflect negatively on you, your co-workers or the Company?
- How would you feel or want to be treated if you were in a similar situation?
- How would you feel if you read about it in the news?

If you're still in doubt about what to do, contact your manager or business leader for guidance. You may also request advice from the Vice President of Business Practices and Compliance or the General Counsel, as they are responsible for establishing and enforcing these policies.



Saint-Gobain North America

20 Moores Road
Malvern, PA 19355, USA
Tel: 610-893-6000
saint-gobain-northamerica.com