

DISCLOSURE

ANONYMOUS EVIDENCE

INVESTIGATIONS

WP COMMITTEE ANONY

AD PERSONNEL ACTION

ADVERSE PERSONNEL

ADVERSE

ANONYMOUS

WB

ADVERSE PERSONNEL ACTION

ADVERSE INVESTIGATION

ACTION RULE

AND POLICY



**Whistle Blower Policy for
the Saint-Gobain Group in India**

Why do we need a Whistle Blower Policy?

Q1

To ensure that the Principles of Conduct and Action and their related obligations are met, the Saint-Gobain Group launched a **Compliance Program** for all its Businesses in 2009. The Program includes four main components - Responsible Development, The Competition Law plan, Internal Audit & Control and Compliance Alerts system.

As a part of the Compliance Alerts system, a whistleblowing system has been deployed within the Group to enhance compliance and give employees a way to alert correspondents of any serious violations of the Principles of Conduct and Action, applicable legislation or internal procedures.

The Whistle Blower (WB) Policy provides a secure framework, within which, the Group's employees in India are encouraged to report unethical or improper practices or acts in particular, or violations of the Code of Conduct, in general. Corrective action is taken against every case, either identified or reported, through the prescribed WB mechanism.



What should be reported under the WB Policy?

Q2

Under the WB Policy, every employee within the Group in India is expected to promptly report to the WB Committee (Delegation/Business) 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 of the Saint-Gobain Businesses in India.



Who are the members of the WB Committee?

Q3

The Delegation WB Committee has the following members:

- Anand Mahajan, General Delegate
- Deepak Chindarkar, Vice-President, Finance & IT, India Delegation & GNO
- K. Visweswaran, Head - Taxation, Legal and Compliance, India Delegation & Company Secretary, GNO

The WB Committee of each of the Group's Businesses in India typically comprises of the Managing Director, the Head of Finance and the Head of HR.



What, when and how should I report?

Q4

What & when to report:

You should report any wrongful act or improper activity known to you. Be open and candid in your communication. 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.

Ways to report:

- You can send a written report or an email or speak (over the phone or in person) to any/some/all members of the WB Committees of the Delegation or the relevant Business*
- You can also directly speak with Mr. Anand Mahajan (General Delegate) on 022-40212151

Note: Intentionally filing a false report shall be considered as a wrongful act. In this case, the complainant will not be protected and strict action may be taken against him/her.

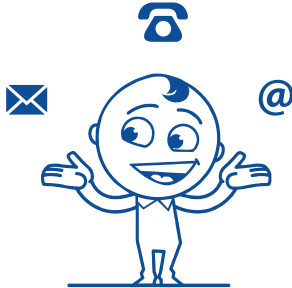


* WB Committee contact list is given on page no. 13-14 of this booklet.

In what format should the disclosure be made?

Q5

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).



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

Q6

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



Can I report something anonymously?

Q7

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.



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

Q8

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.



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

Q9

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.



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

Q10

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 Group's rules and policies.



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?

Q11

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 Business) within 30 days of such action.



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

Q12

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



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