

2023 Fighting Against Forced Labour and Child Labour in Supply Chain Act Report

1. Introduction

This document constitutes the Annual Report (the “**Report**”) pursuant to section 11(1) of the *Fighting Against Forced Labour and Child Labour in Supply Chain Act* (the “**Supply Chain Act**” or the “**Act**”) and is filed on behalf of the following entities each a member of the Compagnie de Saint-Gobain corporate group (“**Saint-Gobain**”):

- Building Products of Canada Corp.;
- CertainTeed Canada, Inc.;
- CertainTeed LLC;
- GCP Canada Inc.;
- Kaycan Ltée/Ltd.;
- KP Building Products Ltd.; and
- Saint-Gobain Canada Inc.

(each a “**Reportable Entity**” and collectively, the “**Reportable Entities**”, “we”, “us” or “our”) covering the financial year ended December 31, 2023.

Forced labour and child labour are contrary to our purpose, vision and values. We do not tolerate forced labour and child labour in our organization or in those of our suppliers and subcontractors. We hold ourselves to the highest standards and expect employees, contract workers and directors of each Reportable Entity and subsidiaries of each Reportable Entity to act with integrity and to comply at all times with the letter and spirit of the laws, regulations and rules applicable to each Reportable Entity in the jurisdictions where we operate and in particular with respect to the Act. If instances arise where these expectations are not met, we will strive to respond in an appropriate manner.

This statement outlines the policies and procedures we have in place and the steps taken by us in Canada during fiscal 2023 to reduce the risk that forced labour and child labour is used at any step of the production of goods in Canada or elsewhere by us or of goods imported into Canada by us or third parties supplying us.

We use a [Suppliers Charter](#) to obtain the commitment of our suppliers on a series of key themes dealing with: (i) respect for the right to development; (ii) employee rights; (iii) occupational health and safety; (iv) legal compliance and environment commitment, including on the avoidance of the use of forced labour and child labour.

Its signature is an essential condition for obtaining a commercial partnership with Saint-Gobain and it is mandatory for suppliers representing more than €100,000 of spend. By signing the Supplier Charter, suppliers and subcontractors undertake not to resort in any way, shape or form, either directly or through their own subcontractors or suppliers to forced or mandatory labour and to child labour.

In addition, our buyers agree to our [Purchasers Charter](#), in which they commit to principles of behaviour and business rules which include making sure that suppliers proposing their services to us must satisfactorily address environment and health & safety (“**EHS**”) requirements in their proposals starting with relevant legal requirements.

In 2023, within the scope of our corporate social responsibility (“**CSR**”) risk analysis process, further described in section 4 of this Report, we have conducted internal analysis of risks of forced and child labour within Saint-Gobain’s activities and supply chains and developed and

implemented an action plan for addressing forced labour and child labour. The on-site and digital audits, further described in section 4 of this Report, ensure appropriate monitoring of our suppliers.

Saint-Gobain is an equal opportunity employer. We utilize a global applicant tracking system where all of our career opportunities are posted and external candidates voluntarily apply to positions which ensures that all workers are recruited willingly. To ensure no individual below the legal age to work in their jurisdiction is employed by Saint-Gobain, we validate personal information, including the date of birth, upon hire.

All new Canadian employees complete a mandatory training course called “Principles of Conduct and Action” and sign a code of conduct upon new hire. Refresher training also occurs throughout their career.

2. Our structure, operations and supply chains

All of the Reportable Entities covered by this Annual Report are corporations. The Reportable Entities are either (i) producing goods in Canada, (ii) selling goods in Canada or abroad; (iii) distributing goods in Canada or abroad; or (iv) importing into Canada goods produced outside of Canada.

The Reportable Entities design, produce and distribute solutions that are found everywhere in our homes and our daily lives – individual, collective and non-residential buildings, transport, infrastructure – as well as in many industrial applications. These solutions provide Reportable Entities’ customers with benefits in terms of performance and sustainability, while meeting the challenges that shape the future of the economy and society. Today, the Reportable Entities and Saint-Gobain already cover most of the applications for renovation as well as for new construction, and in particular sustainable construction: interior systems (partition, insulation, ceilings and floor coverings), exterior systems (façades, glazing, roofing solutions and waterproofing) for traditional as well as light construction – as products or systems that can be preassembled or prefabricated – and the distribution of products, solutions and services for construction and housing. The Reportable Entities’ high performance solutions, for their part, help meet the market’s growing needs on issues such as the decarbonization of construction processes, sustainable mobility and sustainable industry.

Saint-Gobain operates in 75 countries with over 168,000 employees. In Canada, the Reportable Entities employ approximately 2530 employees.

Purchasing is carried out at two different levels in our supply chain:

- Direct manufacturing purchases such as raw materials and packaging, and
- Indirect manufacturing purchases such as waste management.

3. Policies, due diligence and controls

All purchasing activity across our supply chains is based on a common framework, Saint-Gobain’s Responsible Purchasing Policy, which aims to manage and reduce environmental, social and societal risks associated with our supply chains including forced labour and child labour. It is a direct extension of our code of ethics, [the Principles of Conduct and Action](#), and is built around two pillars; [the Purchasers Charter](#) and [the Suppliers Charter](#), which are all currently available on our website.

We abide by the following policies currently available on our website in all purchasing activity;

- [Human Rights Policy](#); and
- [Anti-Corruption Policy](#).

We have been a signatory to the United Nations Global Compact since 2003, committed to respect the ten principles including Principle 4: the elimination of all forms of forced and compulsory labour. These are aligned to the Group's [Principles of Conduct and Action](#) (the "**Principles**") which are the Group's code of ethical conduct that explicitly include workers health, safety and employment rights. The Principles govern the activities of all management teams and employees in the exercise of their professional responsibilities, regardless of the country involved. These Principles help us achieve responsible and sustainable growth, in accordance with Saint-Gobain's long-term strategy.

Reportable Entities 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 whether directly or indirectly or through subcontractors when the latter are working on a Saint-Gobain 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.

The Group's Principles specifically refer to, and are informed by International Labour Organization conventions, in particular the conventions on fundamental labour rights ensuring the promotion of fundamental values such as "abolishing forced or compulsory labour", Organization for Economic Co-operation and Development guidelines, and the International Bill of Human Rights.

Where the international standards provided in the International Labour Organization's 1948 and 1958 conventions on fundamental labour rights differ from national laws or local norms, we respect local regulations while working to apply international human rights standards as comprehensively as possible.

4. Risk Assessment Methodology and Results of Assessment

Forced labour and child labour risks in our supply chain are identified through our responsible purchasing program which is made up of four main steps:



To the best of our knowledge, this CSR risk analysis process helps to identify poor or non-existent management policies which can be indicators of the risk of forced labour and child labour within

our supply chain. The on-site audits performed as part of the CSR evaluation may also raise suspicions of forced labour or child labour or identify a risk of exploitation.

For certain types of goods and services, the prevalence of this risk increases for suppliers and subcontractors located further down the supply chains. Understanding the risk for these indirect suppliers over which we have little control and visibility is complex and difficult and is likely to require certain additional measures that we may decide to implement in the future.

We recognize that our CSR risk analysis process is an ongoing process subject to refinement and improvement. Each year we review our risk analysis process and try to eliminate possible gaps in our analysis. This process is regularly validated with third party experts in CSR program evaluation.

Suppliers deemed to have a high risk through our CSR evaluation tool will be invited to undertake a CSR evaluation through our dedicated evaluation tool which produces ratings and detailed scorecards through an evidence-based evaluation to understand a suppliers CSR performance. This evaluation is adapted to reflect the business categories and takes into account relevant industry certifications in 150 countries and is aligned with global standards like the United Nations Global Compact. The areas evaluated through this digital audit are; environment, labour and human rights including presence of forced labour and child labour, and ethics and sustainable procurement.

After completion of this evaluation, we categorize our suppliers using the following guidelines:

CATEGORY	VALIDITY	EXPECTED ACTION	NEXT STEPS
HIGH RISK	0 months	6 months to implement a Corrective Action Plan	Mandatory within 6 months: External on-site audit After this, reduce to medium risk or delist
MEDIUM RISK	12 months	12 months to implement a Corrective Action Plan	After 12 months: External on-site audit recommended/on-site audit/new assessment based on score
UNDER CONTROL	24 months	Recommendation to implement a Corrective Action Plan	After 24 months: New assessment or on-site audit
OPPORTUNITIES	36 months	Considered as Recommended Suppliers	After 36 months: New assessment or on-site audit

Depending on the level of risk identified, the validity period of the evaluation is determined and where required a corrective action plan is implemented, and if necessary an on-site audit is carried out. Saint-Gobain’s approach is to work with the supplier to improve their CSR performance.

Our contract templates include standard contractual terms highlighting and addressing modern slavery issues and concerns, as well as to require those we do business with to take reasonable steps to identify and address risks of forced- and child labour practices in their operations and supply chains.

5. Risks of forced labour and child labour in our operations and supply chains

To the best of our knowledge, we have not identified risks of forced labour and child labour in our operations and supply chains. Our risk assessment process is reviewed annually with the goal of identifying possible gaps in our assessment.

6. Remedial Action Taken during 2023

Since we have not identified any forced labour or child labour in our activities and supply chains, we have not taken any remediation measures.

7. Our remediation processes

Our “Speak Up Policy” contains an alert system which is open to all: employees of Saint-Gobain, temporary workers, and subcontractors, but also stakeholders such as individuals, suppliers, clients, unions, NGOs or public bodies. This system is operated through a highly secure platform and can be used to report (including anonymously) breaches of our code of ethics, [the Principles of Conduct and Action](#), of the law and of the Saint-Gobain internal group policies, procedures, and commitments. For example, alerts could tackle human rights including (in particular and not exhaustively) non-discrimination, forced and child labor, and corruption, anti-trust and anti-competitive practices, freedom of association and collective bargaining issues.

Alerts issued in good faith are systematically investigated by a dedicated group of Saint-Gobain employees who have been specially trained in the matter and are bound by enhanced confidentiality obligations.

Saint-Gobain is committed to protecting whistleblowers who acted in good faith via: no disciplinary action; no legal proceedings; and no retaliation.

In addition, we have a dedicated Canadian Confidential Hotline which is available to all of Saint-Gobain’s stakeholders (customers, suppliers, trade unions, authorities, etc.) and allow them to report breaches of the law, our Principles of Conduct and Action, or other internal policies, in confidentiality through a secure online system. Workers in each plant operated by Saint-Gobain are educated on the existence of the hotline and the number is displayed or communicated clearly to them.

All reports through this system are processed and investigated as applicable, and appropriate measures are taken when justified. An annual report on incidents involving forced or mandatory labour is published in our [Registration Document](#).

In respect of Canadian government guidelines, Saint-Gobain employs individuals classified as migrant workers. We adhere to all applicable labour laws and regulations concerning the employment of migrant workers, ensuring fair treatment, appropriate compensation, and a safe working environment for all employees.

8. Our remediation actions for the loss of income to the most vulnerable families that results from any measure taken to eliminate forced labour and child labour from our operations and supply chains

We have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

9. Our training

Understanding and complying with the code of ethics is a condition of working at any Reportable Entity, and employees and contract workers must complete the code of ethics training course and acknowledgment annually. We leverage this mandatory annual course to train all employees and applicable contract workers to look for indicators of possible violations of human rights. Each Reportable Entity works to identify, investigate and report potential cases of forced labour and child labour as a predicate offence.

People at every level at Saint-Gobain are individually responsible for applying Saint-Gobain's Principles. Each management level – company, business unit and region – carries its own responsibility for ensuring that these Principles are applied.

The regions must report regularly to the general management of Saint-Gobain on how the Principles are being applied. In order to promote these Principles across Saint-Gobain, the general management is committed to implement awareness and training programs and to decide on appropriate methods to verify compliance with these Principles.

10. Assessing our effectiveness

We intend to continue to assess and refine key performance indicators to measure our success in operationalizing the commitments in our Tackling Modern Slavery Policy and continuously improve our approach to human rights. The effectiveness of a Reportable Entity's industry-specific due diligence process is regularly evaluated to confirm it remains current and aligned with business activities, regulatory developments, industry standards and best practices. By doing so, each Reportable Entity adheres to all applicable laws and regulatory requirements in the jurisdictions in which we operate, including guidance on risk related to forced labour and child labour.

We conduct ongoing screening of all suppliers, which allows us to baseline a supplier's risk profile and subsequently flag and assess any activities that would violate our Supplier Code. We discuss any instances where corrective actions are required with the supplier and track these issues from beginning to completion. No instances were raised for review in 2023, and there were no forced labour or child labour incidents related to our suppliers identified through our supplier monitoring procedures.

To assess the effectiveness of our approach to CSR risks, we consider input from relevant internal and external stakeholders, including investors, clients, civil society and community representatives.

11. Our consultation and governance process

In preparing this Annual Report, each Reportable Entity engaged other entities it owns or controls. It also consulted with key areas of our organization to prepare this Annual Report, including Procurement, Human Resources, the Legal Department and our external legal counsel. These teams operate across our enterprise, including across the subsidiaries to which this Annual Report applies. This consultation process has supported our enterprise-wide approach to forced labour and child labour.

12. Approval

This Annual Report was approved by the governing body of each Reportable Entity on March 25, 2024.

13. Conclusion

Each Reportable Entity remains committed to preventing forced labour and child labour from taking place in our businesses and in our supply chains. We will continue to review our policies, procedures and practices periodically to determine any enhancements we can make to help prevent forced labour and child labour and any other forms of human rights abuse.

14. Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, hereby attest that I have reviewed the information contained in the report for the entities listed below. Based on my knowledge, and after having exercised reasonable due diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I make the above attestation in my capacity as a director of each of Building Products of Canada Corp., CertainTeed Canada, Inc., GCP Canada Inc., Kaycan Ltée/Ltd. and KP Building Products Ltd. for and on behalf of the respective Board of Directors.

Dated this 29th day of April, 2024

Building Products of Canada Corp.

Per: Julie Bonamy
Julie Bonamy, Director
I have the authority to bind
Building Products of Canada Corp.

CertainTeed Canada, Inc.

Per: Julie Bonamy
Julie Bonamy, Director
I have the authority to bind
CertainTeed Canada, Inc.

GCP Canada Inc.

Per: Julie Bonamy
Julie Bonamy, Director
I have the authority to bind
GCP Canada Inc.

Kaycan Ltée/Ltd.

Per: Julie Bonamy
Julie Bonamy, Director
I have the authority to bind
Kaycan Ltée/Ltd.

KP Building Products Ltd.

Per: Julie Bonamy
Julie Bonamy, Director
I have the authority to bind
KP Building Products Ltd.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, hereby attest that I have reviewed the information contained in the report for the entity listed below. Based on my knowledge, and after having exercised reasonable due diligence,

I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I make the above attestation in my capacity as a manager of CertainTeed LLC for and on behalf of the Board of Managers of CertainTeed LLC.

Dated this 29th day of April, 2024

CertainTeed LLC


Per: Mark Rayfield
Mark A. Rayfield, Manager
I have the authority to bind
CertainTeed LLC.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, hereby attest that I have reviewed the information contained in the report for the entity listed below. Based on my knowledge, and after having exercised reasonable due diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I make the above attestation in my capacity as a director of Saint-Gobain Canada Inc. for and on behalf of the Board of Directors of Saint-Gobain Canada Inc.

Dated this 29th day of April, 2024

Saint-Gobain Canada Inc.

Per: 
Reni Chakal, Director
I have the authority to bind
Saint-Gobain Canada Inc.