



## Data Ethics Policy

Saint-Gobain Denmark A/S

### **1 Summary**

The purpose of this data ethics policy is to establish the high standards for data ethics that Saint-Gobain Denmark A/S (“SGDK”) wishes to adhere to and to emphasise our commitment to a responsible and sustainable use of data. SGDK believes in a culture of openness around the data ethical principles used in its business in order to build on its position as a trustworthy partner of our customers, business partners, employees and shareholders.

For all SGDK employees and SGDK business partners who has access to data on behalf or in collaboration with SGDK it is mandatory to use data responsibly by following the guiding principles on data ethics, including by applying a data-centric approach ensuring sustainability when using data.

### **2 Introduction**

Data has become a steadily increasing part of our business and many parts of our business rely on access to data in order to develop our products and services, which includes making informed decisions about our business using technology.

At SGDK we measure ourselves against high ethical standards in all aspects of how we conduct our business. This also applies when we decide to use data as part of our business applying the guiding principles for data ethics focusing on:

- Responsibility - strengthening fundamental rights governance and management;
- Inclusiveness - creating long-term value and engagement where we are present;
- Leadership - ensuring the integration of fundamental rights in our products and services.

The principles described in this policy go above and beyond the requirements of applicable data protection regulation and will be adhered to not only when SGDK processes data relating to an identified or, directly or indirectly, identifiable natural person.

By having data ethics integrated into our products and services, we are in a better position to ensure a responsible and sustainable use of data. We encourage employees and business partners involved in the use of data to have a positive involvement in data ethical questions and to raise concerns ensuring continuous development of the guiding principles for data ethics.



### **3 Scope**

This policy applies to SGDK employees at all levels. The policy also affects SGDK business partners who have access to data on behalf or in collaboration with SGDK.

All principles, guidelines, and rules referenced in this policy must consistently be followed in conjunction with other relevant corporate policies of SGDK. Where stricter rules than laid out in this policy are legally applicable, the stricter legal rules prevail.

### **4 Guiding principles for data ethics**

The guiding principles for data ethics as laid out below set the ethical standard for how we use data within SGDK and are based on the Charter of Fundamental Rights of the European Union wherein especially the principles of human dignity, freedom, equality and solidarity plays a pivotal role for the guiding principles in data ethics.

#### **4.1 Self-determination**

Human self-determination is a priority in all data processes. It is the individual human being who ultimately should have control over what their data is used for and in what context.

Data processes must be transparent and user centric with the highest degree of control for the individual.

#### **4.2 Human dignity**

Human dignity is respected in all data processes. Data is not used to create value and not to exploit knowledge in a manner that is misleading or contrary to the integrity of the individual. Data is sourced and processed in strict accordance with this principle. Therefore, we strive for openness and transparency in respect of both the sources of our data and the purposes pursued for the benefit of the individual. Similarly, we will neither purchase nor sell data from or to third parties.

We also keep a stringent focus on the security of our processing of data. For this reason, the technical and organizational safety measures are always determined in light of the type of data being processed to ensure that an adequate level of security is maintained in light of the involved risk. This extends to e.g. the use of encryption, restriction on access privileges and third party data transfers as well as internal organisational processes aimed at ensuring that data analysis is carried out in a way which protects individuals from discrimination and misuse of data.

Data processes must be secure and ensure the individual against misuse through integrity of the data processes.



### **4.3 Responsibility**

Responsibility is exercising due diligence, including in relation to using new technology, e.g. automated decisions, profiling, artificial intelligence and data sharing with third parties, to promote trust. We are actively working with privacy-by-design and prior to implementing new technology, we will carry out a risk assessment and take into account any risks identified. When conducting the risk assessment, special emphasis will be placed on the nature, scope, context and purposes of the processing. Similarly, we will ensure that responsibilities arising from such risk assessment are clarified towards business partners.

Examples of such risk mitigating measures include ensuring that any artificial intelligence or machine learning solutions utilised are trained on a data set suitable for the task at hand and having safeguards in place to prevent bias.

Data processes must be risk evaluated and compliant at all stages and appropriate contractual measures must be implemented in this respect in relation to external business partners involved.

### **4.4 Equality and fairness**

SGDK must strike a fair balance when using data in all stages. SGDK acknowledges the risk of bias and great emphasis is placed on preventing bias in data (e.g. sorting and washing of data), as well as on promoting designs that avoid discrimination between e.g. population groups, race etc. and distinguishes between correlation and causation. The rationale and criteria for methods to reduce bias and discrimination must always be explicit and open to review. All SGDK employees and SGDK business partners are actively encouraged to point out risks and potential points of improvement to equality and fairness in the data driven systems of SGDK.

Data processes must not discriminate and must be fair using machine learning and data processing algorithms actively to prevent discrimination.

### **4.5 Progressiveness**

Advanced data usage should help create positive progress for society. Technical and organizational solutions must be created with the purpose to support ethically responsible data management to achieve these advances.

Data is key to achieving our goals and as a supplier of construction materials, SGDK uses data e.g. in order to progress the vision of SGDK materials, systems and solutions having a positive influence on the life, health and well-being of human beings – as well as for the planet to ensure that 10 billion people may live in sustainable environments by 2050.

Data processes must be designed with the aim to create positive progress for society.

### **4.6 Diversity**



Demographic and professional diversity is essential in our teams working with data systems and we take great care in ensuring the representation of diverse capabilities and qualifications in addition to those of a purely technical nature. This is done to identify and deal with social and ethical consequences of data processing and to ensure that a representative sample of the needs, values and interests of different population groups are considered from the start when designing data systems.

Data processes must be on boarded with capabilities supporting diversity.

#### **4.7 Accountability**

We are responsible for data in our possession and accountable for how we use data. This is why we require robust governance of data processes in all parts of our organisation. Governance is essential in ensuring that our data processes are based on informed decisions and allow us to account for our decisions based on the guiding principles for data ethics.

Data processes must be documented and be auditable.

### **5 Awareness**

We seek to establish a strong culture of awareness and active involvement in data ethical questions through training and evaluation on an ongoing basis. In case new IT systems assessed to involve a high risk to the rights and freedoms of individuals are implemented, any decision to do so will be taken at the management level.

All SGDK employees are accountable for – and actively involved in – contributing to data processes being compliant with the guiding principles for data ethics with all employees and business partners.

### **6 Ownership**

The Data Ethics Policy is owned, operationally monitored and enforced by the legal department of SGDK.

### **7 Adoption and publication**

This Data Ethics Policy has been adopted by the Board of Directors of SGDK on September, 2024.

The Data Ethics Policy is available on the Company's website, <https://www.saint-gobain.dk>.

All changes to the policy must be adopted by the Board of Directors.