

Benoit Bazin
Chairman & Chief Executive Officer
Compagnie de Saint-Gobain S.A.
Tour Saint-Gobain
12 place de l'Iris
92400 Courbevoie
France

07 July 2026

Dear Mr. Bazin and the Saint-Gobain Leadership Team,

We write to you as [B4Ukraine](#), a coalition of Ukrainian and international civil society organisations working to end the financial and material support that sustains Russia's war against Ukraine. Consistent with the [UN Guiding Principles on Business and Human Rights](#) (UNGPs), we are requesting a dialogue with you about Saint-Gobain's ongoing operations in the Russian Federation and, in particular, its continued minority shareholding in a joint venture located in the Alabuga Special Economic Zone.

Saint-Gobain holds a reported [30%](#) stake in a flat-glass joint venture located in the Alabuga Special Economic Zone, the majority (70%) held by Trakya Cam, part of Turkey's Şişecam Group; the project was originally announced at total investments of around €184 million, with a flat-glass plant capacity of roughly 230,000 tonnes per year. Since 2022, Saint-Gobain has stated that it stopped exports to and imports from Russia and Belarus, suspended new investment, and that its local activities continue "in an autonomous and downgraded mode" — described in media reporting as "not involved" in the operations; it has not announced divestment of its stake. Its joint-venture partner, [Şişecam](#), has been listed by Ukraine's National Agency on Corruption Prevention as an international sponsor of the war. According to recent investigative reporting by the [Kyiv Independent](#), the Alabuga joint venture continues to operate alongside the mass production of long-range attack drones.

Alabuga has been widely identified, including by the [European Union](#), the [US Department](#) of the Treasury, and investigative reporting, as Russia's principal manufacturing site for Shahed-type ("Geran") long-range attack drones, which Russian forces have used in repeated strikes on Ukrainian civilians and civilian infrastructure, including power facilities, hospitals, and residential buildings. The presence of any Western company's operations in or adjacent to this drone-production environment gives rise to heightened, conflict-related legal and human-rights risks that cannot be treated as ordinary commercial risk.

We consider that continued operation in this environment exposes Saint-Gobain to serious and converging risks:

Sanctions and legal exposure. As an EU group, Saint-Gobain is subject to the EU's 19th sanctions package: under [Article 5ah](#) of Council Regulation 833/2014, EU operators were required to divest from listed special economic zones, including Alabuga, by 25 January 2026. US measures, including OFAC designations covering the zone's management, create parallel

exposure. Breaches or circumvention of applicable sanctions may result in serious civil or criminal liability, depending on the relevant jurisdiction and nexus.

Contribution to Russia's war effort. Taxes, fees, and the goods, services, or know-how generated by operations in the zone may, directly or indirectly, [support](#) the Russian state and its military-industrial base.

Mandatory military-support obligations. Russian Federal Law [No. 31-FZ](#) requires companies operating in Russia to maintain military registration of employees, assist in serving call-up papers, and make premises, transport, and other resources available to the armed forces, exposing employers to potential complicity in mobilisation.

Heightened human-rights risk (UNGPs). Operating in a conflict-affected, high-risk area triggers a duty of [heightened human-rights due diligence](#) to identify, prevent, and mitigate involvement in adverse impacts, and to use all available leverage to stop or reduce harm.

Asset and operational risk. Russia has [expropriated](#), nationalised, or placed under "temporary management" the assets of hundreds of foreign companies; remaining in the market offers no assurance of continued control over local assets, profits, or personnel.

Reputational and investor risk. A continued presence alongside the production of weapons used against civilians carries lasting reputational, commercial, and stakeholder consequences.

Under the UNGPs, engaging constructively with affected stakeholders is itself part of responsible business conduct. We are therefore kindly requesting a dialogue with Saint-Gobain, which would be a constructive opportunity to set out the facts, demonstrate the due diligence the company has carried out, and give Saint-Gobain the opportunity to clarify its position before this correspondence is published or addressed in further public reporting. We therefore invite Saint-Gobain to meet with representatives of the B4Ukraine coalition and our Ukrainian and international member organisations.

To make that dialogue productive, we would be grateful if you would address the following:

1. What heightened human-rights due diligence has Saint-Gobain conducted, since 24 February 2022, in relation to its Russian operations and their location in or near the Alabuga zone?
2. What steps has Saint-Gobain taken to ensure that its facilities, assets, equipment, technology, personnel, or services in Russia have not been used, requisitioned, or made available to support Russian state bodies, military-linked actors, occupation authorities, or the armed forces?
3. Can Saint-Gobain confirm whether any goods, services, financing, donations, logistics, facility access, or other resources from its Russian operations have been provided, directly or indirectly, to the Russian state or military since 24 February 2022?
4. How has Saint-Gobain responded to obligations under Russian Federal Law No. 31-FZ regarding military registration and support, and how many employees of its Russian operations have entered military service?

5. What sanctions analysis has Saint-Gobain conducted regarding Alabuga, and does it consider that any EU nexus, ownership, financing, contracts, technology, intellectual property, or management, remains connected to the operation after the relevant sanctions deadlines?
6. Has Saint-Gobain obtained external legal advice, notified competent authorities, applied for any licence or derogation, and what concrete wind-down, ring-fencing, or divestment steps has it taken?
7. Under the UNGPs, a minority shareholder retains a responsibility to use its leverage: what steps has Saint-Gobain taken to use its rights as a 30% shareholder to influence, suspend, ring-fence, or divest the Alabuga joint venture, and does it consider that maintaining this shareholding is consistent with the EU's Article 5ah requirements concerning Russian special economic zones?
8. Where the risks connected to its Russian operations cannot be prevented or effectively mitigated, will Saint-Gobain commit to a complete and responsible exit from the Russian market in line with the UNGPs?

We would welcome a meeting and ask that you confirm your availability by 21 July 2026. We would also be happy to discuss with Saint-Gobain the directions for a responsible exit from the Russian market, based on our latest research. Please note that this letter, and any response you provide, may be published on the B4Ukraine website.

We urge Saint-Gobain to suspend its commercial activities in the Russian Federation and to take concrete steps toward a complete and [responsible exit](#) from the Russian market.

Sincerely,
The B4Ukraine Coalition