

Belron® International Limited

Modern Slavery: Our approach to making a difference

This Modern Slavery Statement was formally approved by the Belron® International Limited Board on 25 June 2025

Scope of statement

This statement is in accordance with the UK Modern Slavery Act 2015. It sets out the activities by Belron® International Limited both in its own operations and with its suppliers, during the financial year ending 31 December 2024.

About Belron® International

Belron International acts as the central support and procurement hub of operations on behalf of the Belron family of businesses. Belron International is home to around 300 employees, primarily office based, in roles including finance, legal, human resources, IT, sales and marketing, supply chain and operations.

About Belron® and its operations

Belron is a global leader in vehicle glass repair, replacement and recalibration (VGRRR) serving motorists with glass damage worldwide, with a presence in 40 countries, through wholly owned businesses and franchises. Our market leading brands include Carglass® across Europe, Safelite® in the US, Autoglass® and Laddaw® in the UK, Lebeau Vitres d'autos®, Speedy Glass®, Apple Auto Glass®, Duro® vitres d'autos and Vanfax® in Canada, O'Brien® in Australia and Smith&Smith® in New Zealand. Aside from dealing directly with customers, Belron manages vehicle glass and other insurance claims on behalf of insurance companies and provides plumbing and electrical solutions to home and business owners in Australia and New Zealand through the Laser® and exceed® brand.

Belron has a common purpose – to make a memorable difference with care for our people, customers, society and our shareholders - in order to generate profitable growth and create value for all these stakeholders. Our ambition is to be the natural choice for our services with customers around the world.

Belron employs around 30,000 people globally across its wholly owned businesses in roles including mobile and branch-based technicians, call centre agents, warehouse and distribution centres' associates, and office-based colleagues supporting the businesses in procurement, marketing, sales, human resources, finance, legal and IT. Each of the Belron country businesses is led and operated by a separate executive team who has direct engagement with the Global Leadership Team (GLTM) at Belron® International.

Working at Belron International

Our employees are at the heart of our business and their wellbeing, engagement and experience are key priorities. We are committed to promoting a workforce free of discrimination and harassment and aim to treat everyone in a fair and equal manner and with dignity and respect.

Each year, Belron International colleagues take part in the Global Engagement Survey. It is an anonymous survey that seeks feedback from all employees on how engaged they are, what their experience of working at the business is like, and how the business demonstrates its values. In 2024, the survey had a response rate of 91% at Belron International and an engagement score of 93%. Engagement is defined as “Being Proud and Committed” and is an average of the Total Favourable score of 3 questions asking whether employees are proud to work for our business, whether they are inspired to work beyond what is required to help us succeed and whether their work gives them a sense of personal accomplishment. 93% of colleagues agreed that the business treats everyone with dignity and respect.

Recruitment at Belron International

Belron International colleagues follow a structured recruitment process encompassing appropriate checks regarding their eligibility and right to work. We complete employment referencing for all candidates who are offered roles within Belron International.

All employees are provided with a clear contract of employment, which complies with applicable local country legislation, and are supported to understand the requirements of their conduct through mandatory Code of Conduct training. We provide fair and equitable pay, employee benefits, a culture of wellbeing and diversity, equity and inclusion, and additional conditions of employment in accordance with local country laws.

Responsible Business Framework

The Belron Responsible Business Framework (the ‘Framework’) applies to all the Belron family of businesses including Belron International. It captures our approach to doing business responsibly across our organisation and our value chain. This guides how we deliver our purpose and create value for all our stakeholders – our people, customers, society and our shareholders.

The Framework has two strategic pillars – working towards Sustainable Products & Services and Investing in People and Society. Our priorities under these pillars are:

- Reducing waste and building a circular economy
- Driving down emissions

- Sustainable procurement
- People safety and wellbeing
- Promoting diversity, equity and inclusion
- Giving back to our communities

Underpinning the Framework are the foundations of strong governance and inspiring leadership; a continued focus on our values and ethics, and a robust and transparent approach to sustainability reporting and measurement. Our strategic pillars are also aligned to the UN Sustainable Development Goals.

Responsible Business governance

Chief People Officer Susan Ormiston, and our Group Customer Director, Richard Tyler, sponsor the two pillars of our Responsible Business Framework. Our responsible business progress is reviewed at least monthly by the Group Leadership Team (GLTM) and at least five times per year by the Belron Board at their regular meetings.

We have a central Responsible Business team at Belron International reporting to the GLTM that coordinates and facilitates our ESG activity by monitoring progress and performance and providing knowledge and expertise to support the delivery of our Responsible Business Framework in every country where we have a presence. In 2024, we strengthened this central team with additional expertise in sustainability and ESG reporting.

Our in-country leadership teams are responsible for their own individual responsible business performances, and how this contributes to the overall objectives of Belron's Responsible Business Framework. A network of Responsible Business Ambassadors, environmental reporters, and in-country subject matter experts and teams support their responsible business agenda locally.

In markets such as Denmark, France, Germany, Spain, Canada, Netherlands, New Zealand and the UK we have dedicated responsible business and sustainability specialists.

Our values & ethics

The Belron Code of Conduct – Our Way of Working sets out the behaviours expected by all employees regardless of role or location. It also promotes organisational values and ethical expectations across the business and demonstrates how to do business in the right way.

The Code supports and guides our people in their day-to-day decisions and makes clear what they can expect from working with us, and what to do if things aren't right. It sets out the minimum standards that must be adhered to globally; it does not replace local country policies but sits alongside existing policies and guidelines.

Our business adheres to and promotes clear ethical standards and expects similar standards from all third parties who work with us or on our behalf. Human rights are a fundamental pillar of our business ethics and are addressed in the Code, as well as how we build and maintain relationships with our suppliers and partners.

Our Code commits us to:	
<ul style="list-style-type: none"> • hold ourselves, our suppliers and our partners accountable for respecting the human rights of everyone connected to our business. • give clear guidance on our expectations towards our suppliers and in our Supplier Code of Conduct. • believe that all employment should be freely chosen, and we will only employ someone working of their own free will. 	<ul style="list-style-type: none"> • not tolerate any form of human trafficking such as forced or bonded labour in any part of our operations or supply chain. • not accept child labour or any practice that inhibits the development of children. • respect and support responsible human rights laws as set out in the UN Universal Declaration of Human Rights and the UN Global Compact.

Our people are expected to always treat each other with respect and ensure that their activities do not contribute directly or indirectly to human rights abuses. In no instances will inhumane treatment of our people or those in our supply chain be acceptable including any form of forced or bonded labour, child labour, physical punishment, or any other abuse.

Training and awareness

In 2023 the updated [Code of Conduct](#) (the “Code”) was launched supported by a global mandatory e-learning module covering all aspects of the Code. Both the Code and the e-learning were translated into all relevant Belron languages and made widely available to all employees, via on-line platforms.

All employees are expected to take the training and certify they have read, understood, and will comply with the Code and following the launch, 100% of employees, including those at Belron International, completed the training.

Since the initial launch, all new joiners have also been required to undertake the training as part of their onboarding. In October 2024 we ran a global recertification programme where all existing employees including those at Belron International, were asked to refresh themselves on the content of the Code and certify that they understood and agreed to their personal responsibilities. The Code will continue to be reviewed annually and updated, if necessary, with all employees needing to recertify.

As reported in our previous statement, in 2023 Belron International launched an annual mandatory modern slavery e-learning module for its employees, developed with external providers that specialise in modern slavery and human trafficking awareness. The purpose of the training is to enable colleagues to recognise modern slavery and help mitigate the risk of incidents. As of 31 December 2024, 95% of Belron International employees have completed the training.

Speaking up

Our Speak Up service, operated by leading provider NAVEX Global, is available for any employee who wants to raise an issue or concern. They can do so in confidence and anonymously by phone or online and in their local language.

We believe that we all have a responsibility to speak up and raise concerns about possible breaches of the law, of Group and local policies or our Code of Conduct. If employees see things that don't look right, or if they are ever unsure of which course of action to take, speaking up allows us to collectively take action and put things right. We want to encourage everyone to speak up and to make it as easy as possible for them to do so.

The Speak Up service is highlighted in the updated Code of Conduct document and incorporated in the mandatory training for all employees. We have focused on streamlining our Speak Up service so that all employees can report concerns in a consistent manner and ensure that the necessary processes are in place in line with the EU Whistleblowing Directive. In 2024, the Speak Up service became available to third parties working with us, such as business partners and suppliers.

No instances of modern slavery or human trafficking were reported to the speak up facility in last 12 months (since our previous Modern Slavery statement).

Our supply chain

Belron International sources and manages the procurement of certain core products and services required by the Belron family of businesses globally. Centrally procured products and services include:

Products:

- The majority of vehicle glass that we fit into our customers cars
- The adhesives used to bond glass to vehicle bodies
- The tools and recalibration equipment used by our technicians
- Consumables such as PPE and glass cleaning products
- Products for resale such as wiper blades and rain repellent

Services:

- Software solutions used by our businesses globally
- Professional services such as consulting and legal services
- Providers of vehicles through lease solutions

Our centrally managed suppliers are located in several countries around the world and our supplier partnerships are built around four key pillars of Quality, Cost, Availability and Sustainability. We buy products and services that meet our strict quality requirements, at optimal cost, and wherever possible make a positive impact on society and the environment.

Our largest and most critical spend category is vehicle glass, which is primarily manufactured in the US, China, Poland, Czechia, South Africa, Turkey and Mexico.

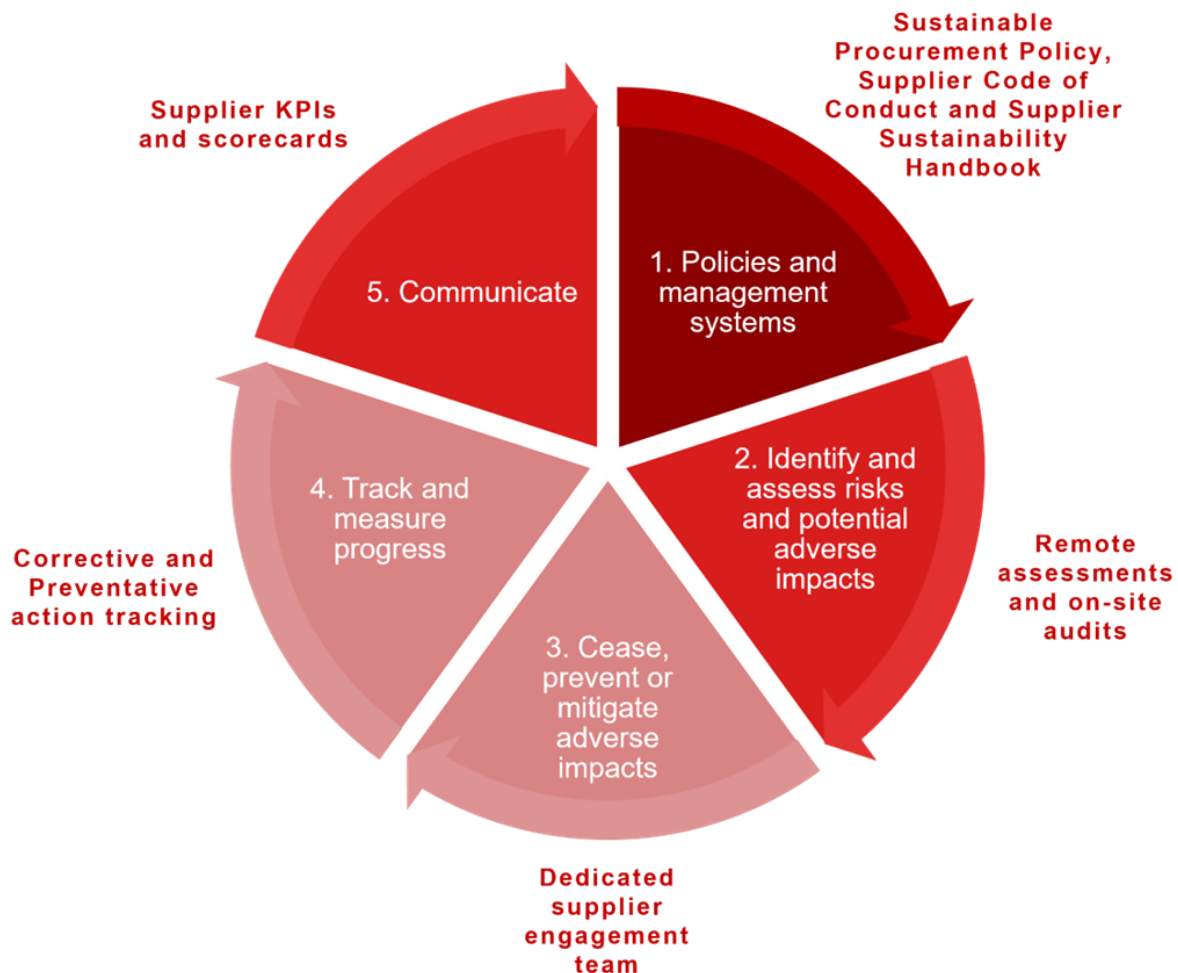
Other products and services required by the Belron businesses locally around the world are sourced and managed through their own local supplier network. The local country businesses are responsible for conducting their own due diligence and for complying with any local modern slavery legislation including the publication of modern slavery statements where required.

Suppliers that have a direct relationship with Belron International are classed as Tier 1 suppliers. Our Tier 1 supply base now comprises 148 production sites globally - an increase of three sites since the prior year. Our Tier 1 suppliers are primarily leading multinational companies with global footprints, with whom we have long-term commercial partnerships. Additionally, we have relationships with some smaller specialist suppliers. Upstream suppliers of raw materials (and parts or components thereof) as well as other goods and services procured without a direct relationship, for example, via an agent or other commercial partners, are classed as suppliers in Tier 2 or beyond.

Within our Tier 1 suppliers:
<ul style="list-style-type: none"> - 55% are located in countries considered to have low risk of modern slavery - 25% are located in countries considered to have a medium risk of modern slavery - 20% are suppliers of good or services considered to carry a high risk of modern slavery
When a supplier is located in an area with a higher risk of modern slavery, we increase the frequency of site audits, and within these, we also increase the number of assessment points that check for any instances of modern slavery

Our Sustainable Procurement programme

Belron International operates a formal Sustainable Procurement programme with the purpose of ensuring that sustainability is part of all our purchasing strategies, buying decisions, and supplier interactions. It is built around a 5-stage due diligence process:



This programme is run by a specialist team, led by the Head of Sustainable Procurement with dedicated resource focused on assessing supply risk and managing an ongoing dialogue with suppliers.

Belron International has a [Supplier Code of Conduct](#) (the 'Supplier Code') which applies to all our suppliers. This Supplier Code sets out the high standards and expectations that suppliers are expected to meet, in order to become and remain an approved supplier. The Supplier Code is available via the Belron website and has been communicated to all Belron International Tier 1 suppliers. Compliance of suppliers with the expectations set out in the Supplier Code, and their performance against sustainability targets, are all critical requirements of doing ongoing business with us. Continued compliance is ensured through our assessment and due diligence programme.

In 2024 we launched an updated Supplier Code of Conduct, setting out our values and the latest expectations we have of our suppliers. We updated the Code with input from our expert partners, internal stakeholders and suppliers.

The Code has three sections. The first, 'Operating Responsibly' covers our requirements on protecting the environment, protecting the health and safety of our suppliers' employees, and supporting local communities. This section also includes our expectations of our suppliers to source responsibly themselves and perform due diligence on their own suppliers. The second section, 'Respecting Human Rights', covers a range of topics designed to protect the rights and freedoms of both our suppliers' employees and those involved in their supply chains, setting out our expectations on matters such as pay and working hours, diversity, child labour and modern slavery. In the third section, 'Acting with Integrity', the Code references our requirements with regards to anti-corruption, protecting data and information, and covers the steps we expect our suppliers to take to ensure they can continue operating and supplying Belron with the goods and services that we need.

The new Code includes the 'Speak Up' mechanism for our suppliers' employees, business partners, or any other third party to raise concerns with us. These concerns can then be investigated by us where appropriate. To date no concerns in relation to modern slavery have been raised via this mechanism.

In 2024 we published our first ever Supplier Sustainability Handbook, a practical 'how-to' guide to help our partners meet our updated Code and understand how we will assess and audit their compliance. The Handbook sets out the core principles behind each of our focus areas, clearly defines the minimum requirement of our suppliers must demonstrate to be

The updated Supplier Code of Conduct, and the new Supplier Handbook were sent to all our centrally managed Tier 1 suppliers. In a series of live webinars, we explained the changes made, how the documents should be used and the importance of compliance as a requirement of doing business with us. We then held deep-dive follow-up sessions to ensure understanding.

In 2024, we also launched our first Conflict Minerals policy, as part of our commitment to ensure that the materials that are used in the products we buy (such as tungsten), or in the manufacturing process (such as tin), are responsibly sourced. We also became the first in our sector to join the Responsible Minerals Initiative and will use the insights and connections this gives us to encourage our suppliers to make a positive difference in this area.

The new Supplier Code includes a specific section (3.1) on Forced Labour and Modern Slavery, stating our position as follows:

We will not tolerate any form of forced or bonded labour in any part of our operations or supply chain

Suppliers must not use any form of involuntary labour including forced, prison or debt-bonded labour

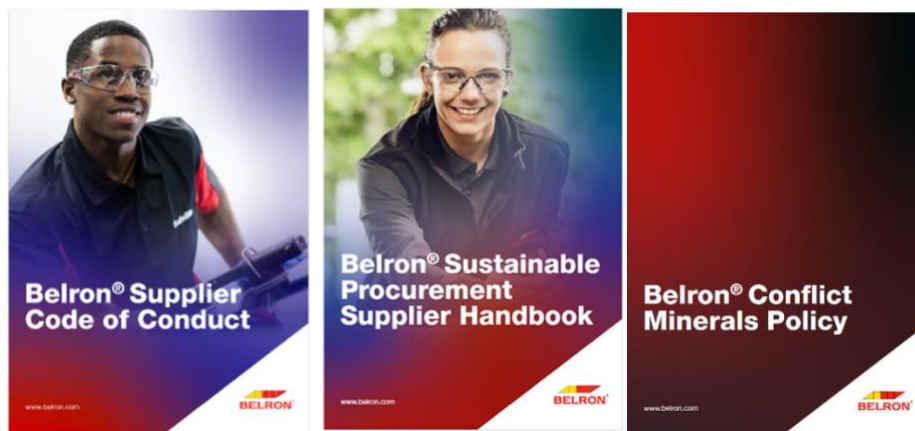
Freedom of movement must not be restricted, including movement in canteens, during breaks, using toilets, accessing water or necessary medical attention

Workers must be allowed to leave the premises after shift end

Employees should not have to pay fees in return for employment

Full compliance with any applicable Modern Slavery legislation or equivalent is essential

Suppliers should conduct appropriate due diligence to address the risk of forced labour and modern slavery in their own operations and supply chains



Assessing risks in the value chain

In 2024 we expanded the systems we use for monitoring our suppliers to give us an improved view of any potential issues. This expansion brought several more suppliers of services into scope and delivered an improved dashboard view summarising the status of all suppliers and any areas that require attention or further investigation. We continue to assess all group suppliers to monitor their financial positions, validate that they are not sanctioned, track any

adverse media or reports that require attention, and assess risks associated with their geographical locations.

Our programme of assessing the full supply chains of our key strategic suppliers also continued through 2024, tracking value chains back to raw materials and assessing a broad range of risks and ESG impacts at each stage. This programme was enhanced in 2024 with the addition of training sessions and workshops for our most critical suppliers to help them understand the risks of modern slavery, and what they can do to help spot and prevent it. The requirement on our suppliers to demonstrate adequate due diligence of their own suppliers was also brought into the scope of this work.

Assessment of suppliers & supplier due diligence

The Sustainable Procurement team regularly updates the details behind the Belron International Tier 1 supply chain, covering all production and distribution sites of centrally procured goods and services, and the shipping routes they take to reach our sites. In addition, we have mapped our Tier 2 and Tier 3 supply chain for our most critical suppliers.

Identification of social and environmental risks in our supply chain, including risks relating to modern slavery, is one of the top priorities of the Sustainable Procurement programme. Using both internal expertise and external resource, this risk assessment is updated at least once a year and used to prioritise and schedule both remote and on-site audits.

In 2024 we introduced a new audit provider, DNV, to complement our existing partnership with Elevate. Together with us, these partners run a bespoke social and environmental on-site supplier audit programme, aligned with our Supplier Code and incorporating modern slavery, health and safety, environment, human rights, and values. A key aspect of the on-site audit is direct dialogue with workers at the production sites, which is done in local languages by the independent expert audit providers. Answers are anonymised and the results of the dialogue, as part of the overall on-site audit results, are communicated to us. This is then followed up by the Sustainable Procurement team to address any gaps and share opportunities for improvements.

The supplier site audit programme continues to utilise a scoring mechanism which in addition to identifying risks, highlights areas of positive impact for which the suppliers are recognised, and which are used to support other suppliers to develop and improve their own positive impact.

ESG Audit Scoring				
Risk Scores			Positive Impact Scores	
Critical Risk -40 and below	Major Risk -11 to -39	Low Risk 0 to -10	High Positive Impact 1 to 49	Leading Positive Impact 50 and above

In 2024, a record 50% of the supplier site audits we completed resulted in the highest possible ‘Platinum’ grade status, up from 44% in 2023. The Platinum grade means that no risks were identified, and only good practices found. Together with 29% achieving ‘Green’ grade, the programme saw 79% of our supplier sites achieving the top two ratings. Throughout 2024 all our suppliers’ sites in scope of the programme were covered by a valid audit. Review periods are set annually done based on risk, criticality, and prior assessment results.

Non-compliance

As outlined in our previous statements, any non-compliances found in supplier audits are addressed in a timely manner and with vigour. If any instances of modern slavery or any other significant non-compliances are found at site level these are reported to the Belron International Board of Directors by the Head of Sustainable Procurement. The initial focus is to work with the supplier to resolve issues with an appropriate action plan and timescales for improvement. If the supplier is unwilling or unable to address and rectify the issue, we have a Responsible Disengagement policy in place to cease relationships with the supplier.

In this past reporting year, from the 22 audits completed, no instances of modern slavery were found. However, there have been two instances of excessive overtime found, and we continue to work with these suppliers to develop solutions.

Plans for the year ahead

Our key focus for 2025 is to add further product categories, currently sourced and managed through the Belron family of businesses’ local supplier network, into our central procurement activities and our Sustainable Procurement due diligence programme.

We also plan to supplement the current mandatory online modern slavery training with in-person training for our employees whose roles are most critical to understanding and mitigating the modern slavery risk.

Susan Ormiston, Chief People Officer

Belron® International Limited Board

Date: 25 June 2025

