

Belron International Modern Slavery statements 2017 - 2024

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 3 June 2024

About Belron®

Belron is the leading vehicle glass repair, replacement and recalibration (VGRRR) business in the world, 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.

Our operations

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 at Belron® International.

Belron International

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. Belron International acts as the central support and procurement hub of operations on behalf of the Belron family of businesses.

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 employees 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, how the business demonstrates its values, and some key DE&I (Diversity, Equity and Inclusion) drivers. In 2023, the Annual Engagement Survey had a response rate of 89% at Belron International and an engagement score of 91%. 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.

Recruitment at Belron International

Belron International colleagues follow a structured multi-stage 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. We are on a journey of continuous improvement in how we attract, source, and retain the best talent from diverse groups of people.

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.

Our Responsible Business Framework

Our approach to responsible business is driven by our purpose of “making a difference with real care”.

The Belron Responsible Business Framework (the ‘Framework’) applies to all the Belron family of businesses including Belron International. It brings together all aspects of how we view “Doing Business Responsibly”, which is derived from our purpose and values. We want to be “a trusted and respected company in the eyes of our people, customers, partners and society, by doing the right thing every day and behaving with integrity in everything we do”.

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

- Reduce our waste and work towards a circular economy
- Drive down emissions
- Integrate environmental and social considerations into all our procurement decisions
- Promote diversity, equity, inclusion and well-being
- Continue giving back to drive positive change
- Prioritise the safety of our people

In addition to and underpinning the Framework are core foundations including, strong governance and inspiring leadership, a continued focus on our values and ethics, and a commitment to developing robust reporting and measurement around our responsible business activities.



Responsible Business governance

Chief People Officer Susan Ormiston is the Executive Team member responsible for ESG (environmental, social and governance). Susan, and Group Customer Director Richard Tyler, sponsor the two pillars of the Belron Responsible Business Framework. Our Responsible Business progress is reviewed at least monthly by the Executive Team and at least five times per year by the Belron Board at their regular meetings.

Reporting into the Executive Team is a central Responsible Business team at Belron International which is responsible for: coordinating and facilitating company-wide activity monitoring progress and performance and providing knowledge and expertise to support the implementation of the Responsible Business Framework by each country business.

The country leadership teams are responsible for their individual responsible business performances and how this contributes to the overall objectives of the Framework. A network of Responsible Business Ambassadors, environmental reporters and in-country subject matter experts support the responsible business agenda locally. In countries including France, Germany, Spain, Canada, Australia, New Zealand and the UK, there are dedicated CSR / sustainability individuals or teams in place.

Our values & ethics

Our 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. During 2023, 100% of our employees, including those at Belron International, completed the training. The Code will be reviewed and, if necessary, updated each year, supported by e-learning for re-certification. Training on the Code is also included in the induction process for all new people joining Belron International and is available via our intranet and publicly via the Belron website.

In addition to the training on the Code, Belron International launched a 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. Since its launch, 92% of 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, 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 was highlighted in the updated Code of Conduct launch and incorporated in the mandatory training for all employees. Going forward, we are 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 will also become 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 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:

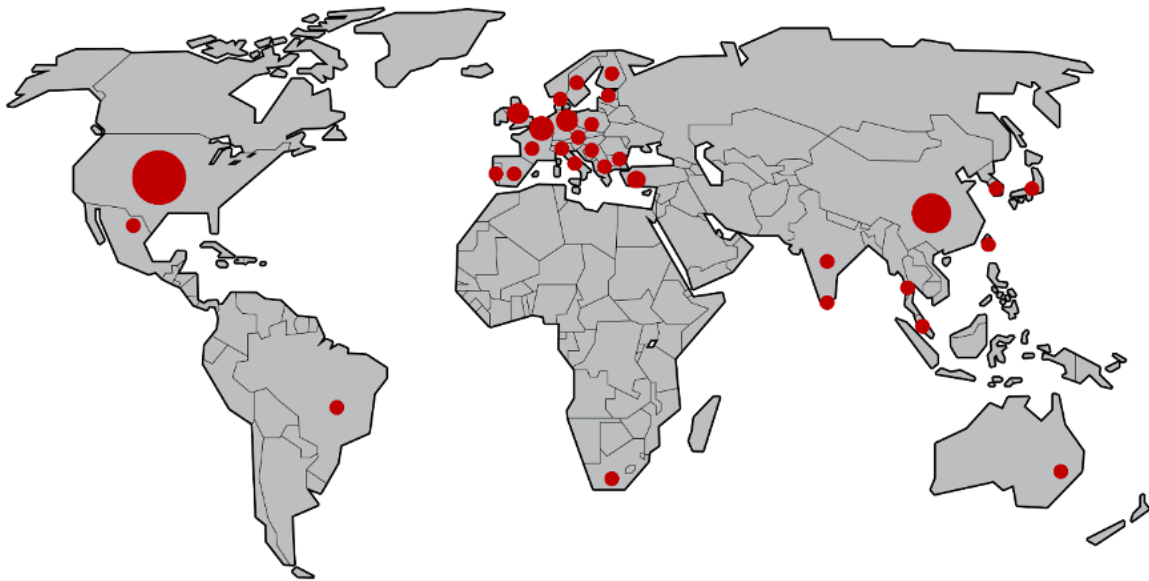
- Software solutions used by our businesses globally
- Professional services such as consulting and legal services
- Providers of vehicles through lease solutions

Our centrally managed suppliers are located in several countries around the world (*see map*) and are carefully selected to deliver value in sustainability, cost, quality and availability.

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.

After vehicle glass, our other most critical spend categories are:

- Adhesives: manufactured in the US and Germany
- Wiper blades: manufactured in Serbia, Belgium, China and Mexico
- Workshop equipment: manufactured in Germany, the US and China



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 incorporates 145 production sites globally, which has increased by five sites in the past reporting 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.

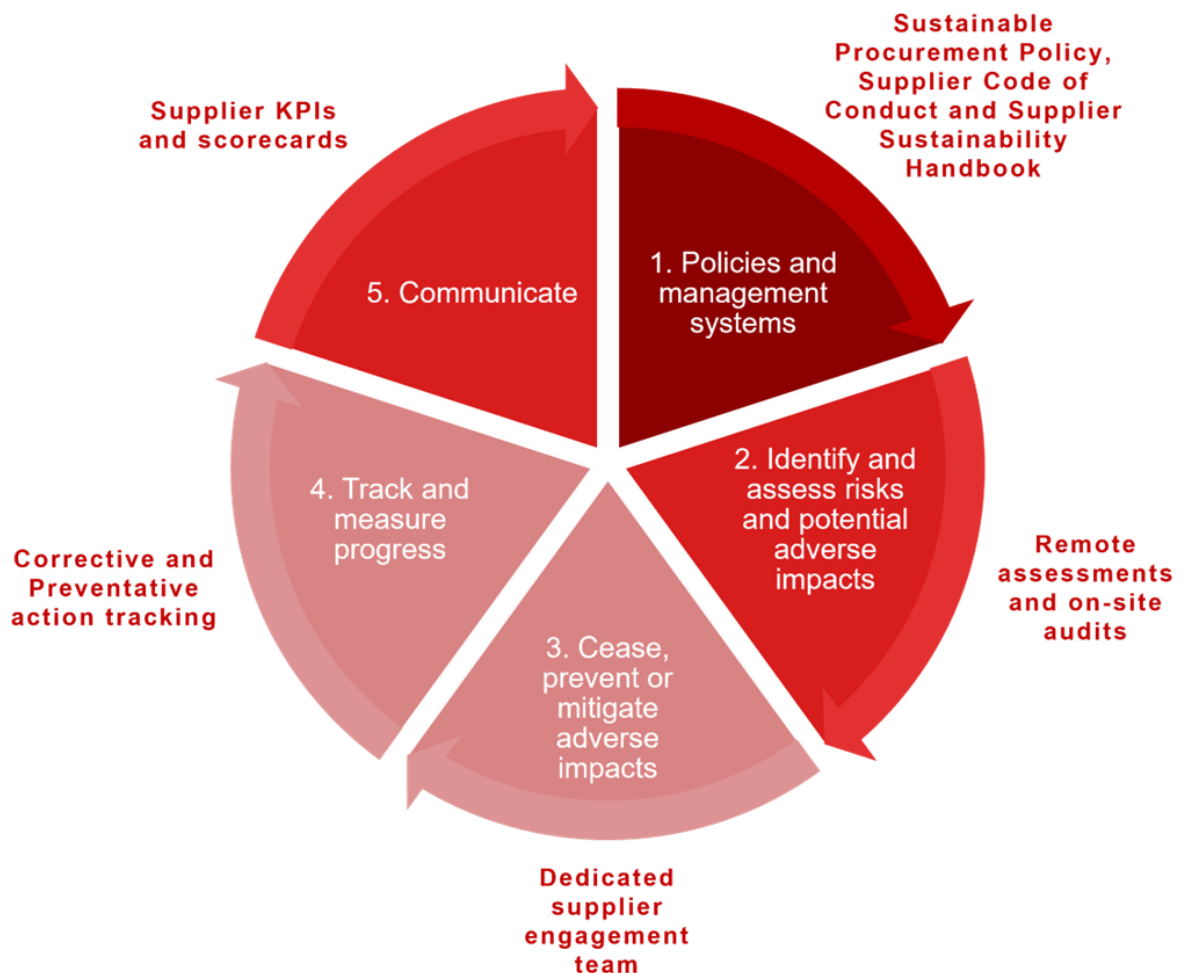
Within our Tier 1 suppliers:

- 57% 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
- 18% 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 embedding sustainability at the forefront 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.

The Supplier Code includes a specific section (3.4) on modern slavery, stating our position as follows:

We expect suppliers to comply with all applicable labour laws, and to respect and support the protection of human rights of workers as well as individuals and communities affected by their activities.

Suppliers must never use or support practices that inhibit the development of children and must not employ anyone under the age of 16 years or, where it is higher, the mandatory national school leaving age. Children and young persons under 18 shall not be employed at night or in hazardous conditions.

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

Suppliers must not require workers to surrender any government issued identification, passport or work permit, or other personal documents, as a 'deposit' or condition of employment.

Full compliance with any applicable Modern Slavery legislation or equivalent is essential, and suppliers must validate their employees' rights to live in the country in which they are based and provide a written contract of employment in a language understood by the employee.

Where the supplier provides living quarters to employees, such quarters must be fit for purpose and meet all legal regulations. Additionally, employees must have the right and ability to leave the quarters as and when they wish.

Through 2023 we developed an updated Supplier Code of Conduct, with a greater level of expectations placed on our suppliers, together with a new Supplier Sustainability Handbook (see below) that gives our suppliers practical guidance on how to meet those expectations. These documents will both be launched during 2024 and rolled out across our supply partners through a series of launch events and other communications. These documents will include details of the mechanism our suppliers or any third parties can use to 'speak up' if they need to raise a concern.



Assessing risks in the value chain

We continued the programme of assessing the supply chains of our key strategic suppliers in 2023, tracking value chains back to raw materials and assessing a broad range of risks and ESG impacts at each stage. The programme expanded through the year with the development of a business continuity framework to assess the capability of suppliers to continue providing goods and services to us in case of adverse events, and to provide contingencies if needed. The programme focused on the suppliers that are most critical to our business, including suppliers of glass, adhesives, and workshop equipment. This work included investigating the risks present across the value chain, understanding the measures in place to minimise and mitigate these risks, and creating of action plans to close any gaps. We are now working with suppliers on implementing these plans.

We use a range of systems to assess risks present in our supply chain, in order to provide real time status as well as alerts of any situations or events that need attention. These systems include platforms that monitor suppliers and their financial positions, validate that they are not sanctioned, and track any adverse media or reports that require further investigation. Risks associated with the geographical locations of suppliers are also taken into account. Additionally, online assessment platforms are used to capture information and data from suppliers on their ESG performance.

Assessment of suppliers & supplier due diligence

The Sustainable Procurement team maintains a complete and up-to-date view of 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 conjunction with two leading audit providers, TÜV and Elevate, we 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 was further enhanced in 2023 with the launch of a new scoring mechanism. In addition to identifying risks, the new scoring mechanism 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 2023 we completed 39 supplier site audits, against a target of 38. The targeted number of site audits is set annually considering the review period set for each site, which is done based on risk, criticality, and prior assessment results. This ensures that all supplier sites in the programme scope are re-audited within their set review period.

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, no instances of modern slavery were found, however one audit found an excessive use of overtime. We are working with the supplier to address and rectify this as effectively and expediently as possible.

Plans for the year ahead

As well as the launch of our updated Supplier Code of Conduct and the Supplier Handbook, our focus for 2024 includes a broader assessment of supply chain risk, with a deeper focus on the risks present in transport routes as well as production locations. Additional focus is also being placed on holding deeper dialogue with suppliers who may struggle to attain top assessment and audit scores, to support them to improve faster. We will also continue to monitor suppliers whose country of operations brings potentially high risk of modern slavery issues and use this to focus our assessments and audits accordingly.

Susan Ormiston

Susan Ormiston, Chief People Officer

Belron® International Limited Board

Date: 3 June 2024

This statement has been published in accordance with the UK Modern Slavery Act 2015. It sets out the steps taken by Belron® International Limited during the financial year ending 31 December 2023 and was approved by the Board on 3 June 2024.



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 28 June 2023

Our business structure

Belron® International Limited acts as the central support and procurement hub of all operations on behalf of the Belron family of businesses (referred to as 'Belron' throughout this statement). Belron is the worldwide leader in vehicle glass repair, replacement and recalibration (VGRRR) operating in 37 countries, through wholly owned businesses and franchises, with market leading brands – including Autoglass® and Laddaw® in the UK, Carglass® across Europe, Lebeau Vitres d'autos®, Speedy Glass®, Apple Auto Glass®, Duro® vitres d'autos and Vanfax® in Canada, Safelite® Autoglass in USA, 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. Each of the Belron family of businesses is led and operated by a separate executive team who has direct engagement with the global leadership team at Belron® International.

For clarity, the Belron family of businesses including Belron® UK have their own supply chains for products and services procured locally and are responsible for conducting their own due diligence and for complying with any local modern slavery legislation.

Our Responsible Business Framework

Belron's approach to responsible business is driven by its purpose of "making a difference with real care".

From a cultural perspective, Belron has a long tradition of serving society, and throughout our entire history we have encouraged our people to give back and we have supported hundreds of charities, NGOs and community groups, most recently establishing the Belron Ronnie Lubner Charitable Foundation. We were an early adopter of EcoVadis sustainability ratings and we have also been a signatory to the United Nations Global Compact since 2010.

The Belron Responsible Business Framework (the 'Framework') brings together all aspects of how we view "Doing Business Responsibly", which is derived from Belron's purpose and values. We want to be "a trusted and respected company in the eyes of our people,



customers, partners and society, by doing the right thing every day and behaving with integrity in everything we do”.

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

- Reduce our waste and work towards a circular economy
- Drive down emissions
- Integrate environmental and social considerations into all our procurement decisions
- Promote diversity, equity, inclusion and well-being
- Continue giving back to drive positive change
- Prioritise the safety of our people

In addition and underpinning the Framework, are core foundations including strong governance and inspiring leadership, a continued focus on our values and ethics, and a commitment to developing robust reporting and measurement around our responsible business activities.

THE BELRON® RESPONSIBLE BUSINESS FRAMEWORK



Our values & ethics

The Belron Code of Conduct (the 'Code'), which includes core guiding principles of integrity, respect and trust, details the company's set of values and ethics that provide clarity on what is acceptable behaviour across the organisation. The Code, which has been in place since 2010, remains an important part of Belron's way of working today. Each Belron business is responsible for the development of its localised code of ethics based on a centralised framework. Training and communications around ethical behaviour are also conducted at local level.



The business adheres to and promotes clear ethical standards for itself and expects similar standards from all third parties who work with Belron or on its behalf. Human rights are a fundamental pillar of Belron's ethics and are addressed in the Code.

Our Code commits us to:	
<ul style="list-style-type: none"> • Always respect the human rights of everyone who works for us and on our behalf • Encourage partners, suppliers and others third parties to adopt similar standards of respect • Understand that we will not work with any organisation that fails to uphold basic human rights or one that might cause the company embarrassment by their links to inappropriate organisations or regimes 	<ul style="list-style-type: none"> • Report any concerns about human rights abuse immediately • Respect the rights of our colleagues to be involved in trade unions or collective bargaining arrangements • Avoid working with suppliers who fail to meet our standards and carry out checks to ensure compliance • Understand that in certain circumstances we may work with a supplier to improve standards first before terminating an agreement

Belron 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 its people or those in its supply chain be acceptable including any form of forced or bonded labour, child labour, physical punishment or any other abuse.

The Code which incorporates "Our Way of Working" is a public document available through the Belron website. Awareness of the Code is included in the induction process for all new people joining Belron International.

As reported in our 2022 statement, we worked with an external partner to review and evaluate our current Code. In the past reporting year, this work has moved to the next phase of collaborating with our family of businesses for their input in developing an updated Code and a global training programme for all Belron people, to be rolled out in 2023. This will incorporate best practice training delivery and annual certification and will provide additional training to individuals who have distinct obligations such as leaders, procurement managers and sales teams.

Belron maintains a Speak Up facility through NAVEX Global that provides a channel to all colleagues to raise concerns in confidence, in local language and anonymously, about behaviours or activities not aligned to the Code. Every issued raised through the Speak Up facility is investigated by the Belron International legal team with support from the local businesses, and appropriate action taken where necessary. No instances of modern slavery were reported to the Speak Up facility in last 12-months (since our previous Modern Slavery statement).

The People team at Belron® International follow a rigorous recruitment process carrying out appropriate checks regarding each individual's eligibility and right to work. We also



complete employment referencing for all candidates who are offered roles. Employees are provided with a clear contract of employment, which complies with applicable local country legislation. We are committed to promoting a workforce free of discrimination and harassment and everyone must be treated in a fair and equal manner and with dignity and respect. We provide fair and equitable pay, benefits and additional conditions of employment in accordance with local country laws.

Diversity, Equity and Inclusion ('DE&I') is a global priority for the business and is a key component of the Belron Responsible Business Framework. Our ambition is to continue to have an organisation that protects its people and values difference in all its forms, creating an environment which enables everyone to participate and reach their full potential. We are committed to hiring and promoting people on the basis of their ability for a role and their appreciation of and respect and alignment with the company's culture. By 2025 our ambitions are to improve our gender mix across the business and improve the overall diversity of the Belron Leadership Group.

Having established a philosophy, approach and goals on DE&I in the past reporting year we have focused on sharing this Group wide framework through engagement and storytelling with senior leaders across the Belron family of businesses. The Annual Engagement Survey once again included DE&I questions to help track progress. We also recognised key global events to help celebrate and recognise our differences and create awareness.

Robust reporting & measurement

A majority of the Belron businesses continue to use the EcoVadis sustainability ratings to measure performance and benchmark themselves with other businesses in the areas of labour practices and human rights, environment, sustainable procurement and business ethics. In 2022, the Belron businesses in France, Germany, Italy, Netherlands, Finland, New Zealand and Sweden all retained their gold medal rating with high scores in all areas of the assessment, and the businesses in Spain and Canada retained their silver medal rating.

As well as fulfilling mandatory requirements regarding ESG reporting, we are developing our reporting to meet the needs of our different stakeholders and to ensure robust and transparent reporting of all our responsible business activities. This currently includes the Non-Financial Reporting Disclosure within the D'Ieteren Group annual report as well as preparing to meet requirements of the UK's Climate-Related Financial Disclosure (CRFD) and the EU's Corporate Sustainability Directive (CSRD); and the publication of the UN Global Compact Communication on Progress in which 2022 was the 12th consecutive year of reporting to this framework.

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

vehicle glass
trims
adhesives
workshop equipment
tools
consumables
products for resale

Services

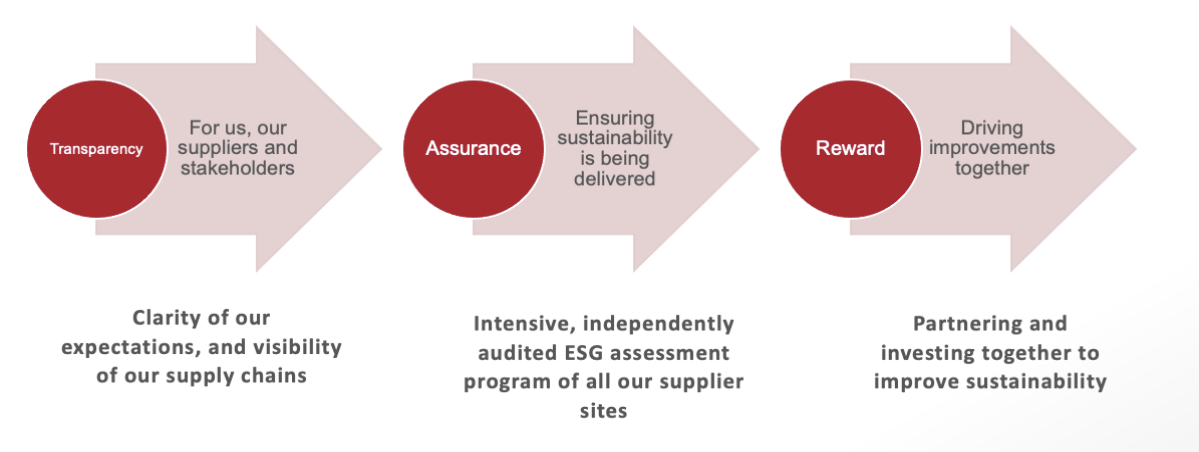
software solutions
IT maintenance
professional services
vehicle lease providers

Other products and services required by the Belron businesses locally are sourced and managed through their own local supplier network.

Suppliers that have a direct contractual relationship with Belron International are classed as Tier 1 suppliers. Our Tier 1 supply base now incorporates 140 production sites globally, which is an increase of nine sites in the past reporting year. This Tier 1 supply base is based primarily on relationships with a small number of long-term commercial partners. In general, these are leading, multinational companies with global footprints, together 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.

Our Sustainable Procurement programme

Belron International operates a formal Sustainable Procurement programme run by a specialist team, led by the Head of Sustainable Procurement. The purpose of the programme is to embed sustainability at the forefront of all our supplier interactions including purchasing strategies and buying decisions and is structured around three key pillars of transparency, assurance, and reward:



Belron International has a Supplier Code of Conduct (the 'Supplier Code') which applies to all suppliers of Belron International and includes the high standards and expectations that they must all meet to both 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. Suppliers’ compliance with the expectations set out in the Supplier Code and their performance against sustainability targets, are all critical requirements of conducting business with us.

<p>The Supplier Code includes a specific section (3.4) on modern slavery, stating our position as follows:</p>
<p>We expect suppliers to comply with all applicable labour laws, and to respect and support the protection of human rights of workers as well as individuals and communities affected by their activities.</p> <p>Suppliers must never use or support practices that inhibit the development of children and must not employ anyone under the age of 16 years or, where it is higher, the mandatory national school leaving age. Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>Suppliers must not use any form of involuntary labour including forced, prison or debt-bonded labour.</p> <p>Suppliers must not require workers to surrender any government issued identification, passport or work permit, or other personal documents, as a ‘deposit’ or condition of employment.</p> <p>Full compliance with any applicable Modern Slavery legislation or equivalent is essential, and suppliers must validate their employees’ rights to live in the country in which they are based and provide a written contract of employment in a language understood by the employee.</p> <p>Where the supplier provides living quarters to employees, such quarters must be fit for purpose and meet all legal regulations. Additionally, employees must have the right and ability to leave the quarters as and when they wish.</p>

Our supplier due diligence

The Sustainable Procurement team maintains a complete and up to date map of the Belron International Tier 1 supply chain, covering all production and distribution sites of centrally procured goods and services. In 2022 we mapped our Tier 2 and Tier 3 supply chain from our most critical suppliers with a specific focus on modern slavery risk areas.

Identification of social and environmental risks in our supply chain including those around 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 regularly and used to prioritise and schedule both remote and on-site audits.



In conjunction with two leading audit providers, TÜV and Elevate, we run a bespoke social and environmental on-site supplier audit programme, aligned with our Supplier Code and incorporating modern slavery, health and safety, environment, labour and values. Our independent audit partners are responsible for undertaking site audits and assisting us in further developing our Sustainable Procurement programme. 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 we use. Answers are anonymised and the results of the dialogue, as well as the on-site audit results are communicated to Belron International. This is followed up by the team to address any gaps and share opportunities for improvements.

In 2022 we completed 37 supplier site audits in addition to the 31 completed in 2021. This means that all high risk and critical Tier 1 supplier sites have been audited at least once since the start of the programme which meets our target as set out in our 2022 statement. Tier 1 suppliers are now monitored and re-audited on a rolling basis based on risk, criticality, and the results of the previous audits. In addition, we perform full supply chain assessments of our most critical suppliers. This involves performing ESG audits of the full supply chain of our suppliers back to the raw materials. The audits focus on modern slavery, health and safety, environment, labour and values.

We continue to monitor suppliers whose country of operation brings potentially high risk of modern slavery issues and use this to focus our assessments and audits accordingly.

As outlined in our previous Modern Slavery statements, any non-compliances found in supplier audits are addressed in a timely manner and with vigour. If any instances of modern slavery are found at site level these will be reported to the Belron International Board of Directors by the Head of Sustainable Procurement, with an appropriate action plan and timescales for improvements.

Following any non-compliance, the initial focus will be working with the supplier to resolve any issues, however we are committed to responsibly disengage with any suppliers who may demonstrate an unwillingness or inability to comply or to address any issues. We will report on non-compliances as part of our annual Modern Slavery Statement. In this past reporting year, no instances of modern slavery were found.

Training and awareness

Building Relationships with Suppliers and Partners and Human Rights are two key sections within the new Belron Code of Conduct, providing an overview of our approach as well as our employees' responsibilities, and are incorporated in the training module due to be rolled out in 2023.

With a focus on the Sustainable Procurement programme, we are committed to providing refresher training to all Belron International employees and training to new employees as part of on-boarding. The purpose of the training is to enable colleagues to recognise



modern slavery and help mitigate the risk of incidents. This training will be conducted in partnership with external providers that specialise in modern slavery and human trafficking awareness.

Susan Ormiston

Susan Ormiston, Chief People Officer

Belron® International Limited Board

Date: 28 June 2023

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Belron® International Limited during the financial year ending 31 December 2022 and was approved by the Board on 28 June 2023.

2022

STATEMENT



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 29 June 2022.

Our business structure

Belron® International Limited acts as the central support and procurement hub of all operations on behalf of the Belron family of businesses (referred to as 'Belron' throughout this statement). Belron is the worldwide leader in vehicle glass repair, replacement and recalibration (VGRRR) operating in 37 countries, through wholly owned businesses and franchises, with market leading brands – including Autoglass®, Carglass®, Lebeau Vitres d'autos®, Speedy Glass®, Safelite® Autoglass, O'Brien® and Smith&Smith®.

Aside from dealing directly with customers, Belron manages vehicle glass and other insurance claims on behalf of insurance companies. Each of the Belron family of businesses is led and operated by a separate executive team who has direct engagement with the global leadership team at Belron® International.

For clarity, the Belron family of businesses including Belron® UK have their own supply chains for products and services procured locally and are responsible for conducting their own due diligence and for complying with any local modern slavery legislation.

Our Responsible Business Framework

Belron's approach to responsible business is driven by its purpose of "making a difference with real care".

From a cultural perspective, Belron has a long tradition of serving society, and throughout our entire history we have encouraged our people to give back and we have supported hundreds of charities, NGOs and community groups, most recently establishing the Belron Ronnie Lubner Charitable Foundation. We were an early adopter of EcoVadis sustainability ratings and we have also been a signatory to the United Nations Global Compact since 2010.

Towards the end of 2020 we reviewed our corporate responsibility strategy and developed the Belron Responsible Business Framework (the 'Framework'). This brings together all aspects of how we view "Doing Business Responsibly", which is derived from Belron's purpose and values. We want to be "a trusted and respected company in the eyes of our people, customers, partners and society, by doing the right thing every day and behaving with integrity in everything we do".

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



- Reduce our waste and work towards a circular economy
- Drive down emissions
- Integrate environmental and social considerations into all our procurement decisions
- Promote diversity, equity, inclusion and well-being
- Continue giving back to drive positive change
- Prioritise the safety of our people

In addition and underpinning the Framework, are core foundations including strong governance and inspiring leadership, a continued focus on our values and ethics, and a commitment to developing robust reporting and measurement around our responsible business activities.

The Framework was launched across the Belron family of businesses in 2021, and the company has made progress across all elements and has ambitious plans to do more in all areas.

THE BELRON® RESPONSIBLE BUSINESS FRAMEWORK



Our values & ethics

The [Belron Code of Ethics](#) (the 'Code'), which includes core guiding principles of integrity, respect and trust, details the company's set of values and ethics that provide clarity on what is acceptable behaviour across the organisation. The Code, which has been in place since 2010, remains an important part of Belron's way of working today. Each Belron business is responsible for the development of its localised code of ethics based on a centralised framework. Training and communications around ethical behaviour are also conducted at local level.



The business adheres to and promotes clear ethical standards for itself and expects similar standards from all third parties who work with Belron or on its behalf. Human rights are a fundamental pillar of Belron's ethics and are addressed in the Code.

Our Code commits us to:	
<ul style="list-style-type: none"> • Always respect the human rights of everyone who works for us and on our behalf • Encourage partners, suppliers and others third parties to adopt similar standards of respect • Understand that we will not work with any organisation that fails to uphold basic human rights or one that might cause the company embarrassment by their links to inappropriate organisations or regimes 	<ul style="list-style-type: none"> • Report any concerns about human rights abuse immediately • Respect the rights of our colleagues to be involved in trade unions or collective bargaining arrangements • Avoid working with suppliers who fail to meet our standards and carry out checks to ensure compliance • Understand that in certain circumstances we may work with a supplier to improve standards first before terminating an agreement

Belron 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 its people or those in its supply chain be acceptable including any form of forced or bonded labour, child labour, physical punishment or any other abuse. The Code which incorporates "Our Way of Working" is a public document available through the Belron website. Awareness of the Code is included in the induction process for all new people joining Belron® International.

In late 2021, we partnered with PwC to review and evaluate our current Code. From that review, we are currently in the process of updating the Code to reflect the latest in best practices, new regulations and updated government guidance. The updated Code will be supported by a global training programme (with annual refreshers and certification) for all Belron people, including Belron® International employees. Specialised training for specific roles that highlight key obligations, such as leaders, procurement managers and sales team will be part of the overall programme.

Belron maintains a Speak Up facility through NAVEX Global that provides a channel to raise concerns about behaviours or activities not aligned to the Code. Every issue raised through the Speak Up facility is investigated by the Belron® International legal team with support from the local businesses, and appropriate action taken where necessary. No instances of modern slavery were reported to the speak up facility in last 12-months (since our previous Modern Slavery statement).

The People team at Belron® International follow a rigorous recruitment process carrying out appropriate checks regarding each individual's eligibility and right to work. We also complete employment referencing for all candidates who are offered roles. Employees are provided



with a clear contract of employment, which complies with applicable local legislation. We are committed to promoting a workforce free of discrimination and harassment and everyone must be treated in a fair and equal manner and with dignity and respect. We provide fair and equitable pay, benefits and additional conditions of employment in accordance with local laws.

Diversity, Equity and Inclusion ('DE&I') is a global priority for the business and is a key component of the Framework. Our ambition is to continue to have an organisation that protects its people and values difference in all its forms, creating an environment which enables everyone to participate and reach their full potential. We are committed to hiring and promoting people on the basis of their ability for a role and their appreciation of and respect and alignment with the company's culture.

We have developed a group wide philosophy, approach and goals to DE&I. An initial key step has been to understand the current position through surveys conducted as part of our employee listening and engagement. In the 2021 annual engagement survey key DE&I questions were asked of all employees globally providing feedback, insights and a solid baseline.

By 2025 our ambitions are to improve our gender mix across the business and improve the overall diversity of the Belron Leadership Group.

Robust reporting & measurement

The Belron businesses continue to use the EcoVadis sustainability ratings to measure performance in the areas of labour practices and human rights, environment, sustainable procurement and business ethics. Our business in Finland increased its EcoVadis rating from Silver to Gold; the businesses in France, Denmark, Sweden, Norway and New Zealand all retained their Gold rating; and the business in Belgium was the first Belron subsidiary to achieve the new Platinum rating.

Reporting requirements in the area of ESG continue to grow and develop. As well as fulfilling mandatory requirements, we are committed to developing our reporting to meet the needs of our different stakeholders and to ensure robust and transparent reporting of all our responsible business activities.

Today this includes the Non-Financial Reporting Disclosure within the D'Ieteren Group annual report; the publication of our UN Global Compact Communication on Progress; and the publication of Belron® International statement in response to the UK Modern Slavery Act 2015.



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:

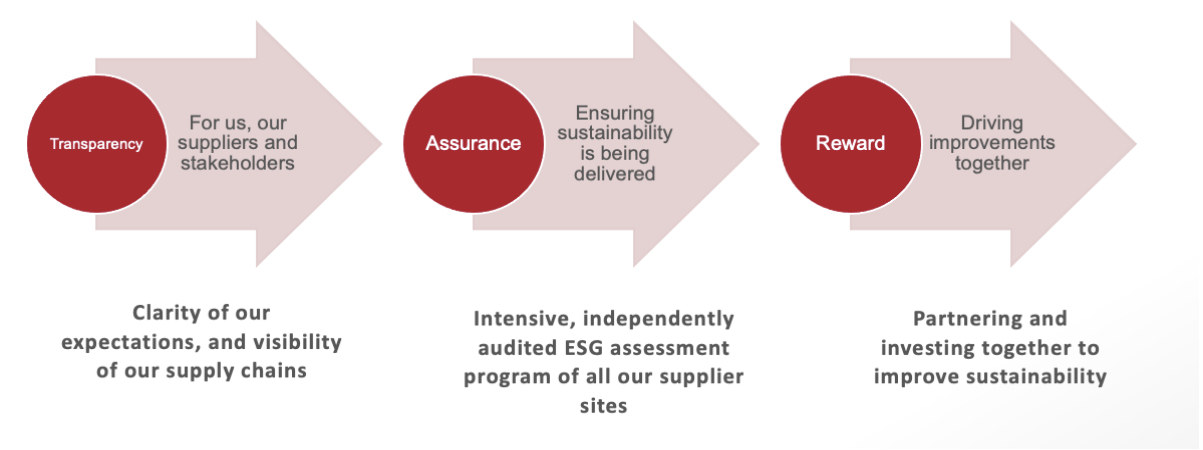
Products	Services
vehicle glass	software solutions
trims	IT maintenance
adhesives	professional services
workshop equipment	vehicle lease providers
tools	
consumables	
products for resale	

Other products and services required by the Belron businesses locally are sourced and managed through their own local supplier network.

Suppliers that have a direct contractual relationship with Belron® International are classed as Tier 1 suppliers. Our Tier 1 supply base covers 131 production sites globally, which has increased from 120 in 2021. This tier 1 supply base consists of primarily, relationships with a small number of long-term commercial partners. In general, these are leading, multinational companies with global footprints, together 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.

Our Sustainable Procurement programme

Since 2020, Belron International has operated a formal Sustainable Procurement programme with the purpose of embedding sustainability at the forefront of all our supplier interactions including purchasing strategies and buying decisions. The programme is structured around three key pillars of transparency, assurance, and reward:





This programme is run by a specialist team, led by the Head of Sustainable Procurement with dedicated resource and a ring-fenced budget. The team has been further expanded in 2022 to facilitate a greater level of risk assessments and dialogue with suppliers.

Belron® International has a [Supplier Code of Conduct](#) (the 'Supplier Code') which applies to all suppliers of Belron® International and includes the high standards and expectations that they must all meet to both 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.

The Supplier Code includes a specific section (3.4) on modern slavery, stating our position as follows:

We expect suppliers to comply with all applicable labour laws, and to respect and support the protection of human rights of workers as well as individuals and communities affected by their activities.

Suppliers must never use or support practices that inhibit the development of children and must not employ anyone under the age of 16 years or, where it is higher, the mandatory national school leaving age. Children and young persons under 18 shall not be employed at night or in hazardous conditions.

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

Suppliers must not require workers to surrender any government issued identification, passport or work permit, or other personal documents, as a 'deposit' or condition of employment.

Full compliance with any applicable Modern Slavery legislation or equivalent is essential, and suppliers must validate their employees' rights to live in the country in which they are based and provide a written contract of employment in a language understood by the employee.

Where the supplier provides living quarters to employees, such quarters must be fit for purpose and meet all legal regulations. Additionally, employees must have the right and ability to leave the quarters as and when they wish.

The Sustainable Procurement programme aims to drive and incentivise supplier sustainability performance. In 2021, we launched the Sustainable Supplier Awards, an annual programme with multiple categories that recognise the success of our suppliers and how they can contribute to Belron's responsible business agenda. The criteria for the awards include positive environmental and social impact, contribution to our responsible business goals, and assessment and audit results. The first award will be presented in 2022.



Our supplier due diligence

The Sustainable Procurement team maintains a complete and up to date map of the Belron® International Tier 1 supply chain, covering all production and distribution sites of centrally procured goods and services. We are currently mapping our Tier 2 supply chain with a specific focus on modern slavery risk areas and will soon expand this to include Tier 3 for high-risk suppliers and categories.

Identification of social and environmental risks in our supply chain including those around 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 regularly and used to prioritise and schedule both remote and on-site audits.

As reported in the 2021 statement, in conjunction with two leading audit providers, TÜV and Elevate, we have developed a bespoke social and environmental on-site audit programme, aligned with our Supplier Code and incorporating modern slavery, health and safety, environment, labour and values. Our independent audit partners are responsible for undertaking site audits and assisting us in further developing our Sustainable Procurement programme. 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 we use. Answers are anonymised and the results of the dialogue, as well as the on-site audit results are communicated to Belron® International. This is then followed up by the team to address any gaps and share opportunities for improvements.

The programme of site audits launched in Q3 2021 with a target of completing 30 to 40 on-site audits by the end of December 2021. We completed 31 audits and will continue to accelerate the programme through 2022 to meet our target of auditing all Belron® International Tier 1 supplier sites by Q3 2022 (as set out in our 2021 statement). As part of our programme, Tier 1 supplier sites will undergo annual re-assessment.

In our 2021 statement, we noted that our internal risk assessments identified that due to the production location (Malaysia), one of our purchased goods from a Tier 1 Supplier, namely nitrile gloves, had a potential risk of modern slavery. As indicated in our 2021 statement, we have since conducted a detailed on-site social and environmental audit and are satisfied that there are no instances of modern slavery present.

Any non-compliances found in supplier audits are addressed in a timely manner and with vigour. If any instances of modern slavery are found at site level these will be reported to the Belron International Board of Directors by the Head of Sustainable Procurement, with an appropriate action plan and timescales for improvements.

Following any non-compliance, the initial focus will be working with the supplier to resolve any issues, however we are committed to responsibly disengage with any suppliers who may demonstrate an unwillingness or inability to comply or to address any issues. We will report



on non-compliances as part of our annual Modern Slavery Statement. In this past reporting year, no instances of modern slavery were found.

Training and awareness

To support the Sustainable Procurement programme, we are committed to providing refresher training to all Belron® International employees and training to new employees as part of on-boarding. The purpose of the training is to enable colleagues to recognise modern slavery and help mitigate the risk of incidents. This training will be conducted in partnership with external providers that specialise in modern slavery and human trafficking awareness.

A handwritten signature in black ink, appearing to read "G. Lubner".

Gary Lubner, CEO
Date: 29-06-2022

Belron® International Limited Board

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Belron® International Limited during the financial year ending 31 December 2021 and was approved by the Board on 29 June 2022.

2021

STATEMENT



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 14 June 2021

Our business - structure

Belron® International Limited acts as the central support and procurement hub of all operations on behalf of the Belron® Group (referred to as 'Belron®' throughout this statement). Belron® is the worldwide leader in vehicle glass repair, replacement and recalibration (VGRRR) operating in 40 countries, through wholly owned business units and franchises, with market leading brands – including Autoglass®, Carglass®, Lebeau Vitres d'autos®, Speedy Glass®, Safelite® Autoglass, O'Brien® and Smith&Smith®. Aside from dealing directly with customers, Belron® manages vehicle glass and other insurance claims on behalf of insurance companies. Each of the Belron® business units is led and operated by a separate executive team who have direct engagement with the global leadership team at Belron® International.

For clarity, the Belron® business units including Belron® UK have their own supply chains for products and services procured locally and are responsible for conducting their own due diligence and for complying with any local modern slavery legislation.

Our business - people & culture

Belron® has been a signatory to the United Nations Global Compact (UNGC) for the past 10 years. Belron® International and the Belron® business units have been aligning its strategies and operations to undertake business responsibly in accordance with the UNGC's Ten Principles of responsible business in the areas of labour, human rights, environment and anti-corruption. We are members of the UNGC UK Local Network and engage in issues-based events on learning and knowledge sharing with other businesses and civil society experts.

The Belron® International approach to Responsible Business is driven by the Belron® purpose of "making a difference with real care" and reflects the culture of the business - the 'Spirit of Belron' which incorporate the core values of Collaborative, Driven, Caring and Genuine. These values guide our approach to the way we work with each other, the way we engage with our partners and the way we manage our business.

Human rights are a fundamental pillar of our Responsible Business strategy and are addressed in the [Belron® Code of Ethics - Our Way of Working](#) (the Code) which represents our core principles of Integrity, Respect and Trust. The Code, which is applicable to everyone at Belron® International as well as the Belron® businesses around the world, commits us to;

- always respect the human rights of everyone who works for us and on our behalf;
- encourage partners, suppliers and other third parties to adopt similar standards of respect;
- understand that we will not work with any organisation that fails to uphold basic human rights or one that might cause the company embarrassment by their links to inappropriate organisations or regimes;
- report any concerns about human rights abuse immediately; and



- respect the rights of our colleagues to be involved in trade unions or collective bargaining arrangements.

The Code which incorporates “Our Way of Working” is a public document available through the Belron® website. Awareness of the Code is included in the induction process for all new people joining Belron® International.

Belron® also maintains a Speak Up facility that provides a channel to raise concerns about behaviours or activities not aligned to The Code and its principles. Every issue raised through the Speak Up facility is investigated by the Belron® International legal team with support from the local businesses, and appropriate action taken where necessary.

In the last year, the provider of the Speak Up facility has changed from Expolink to NAVEX Global following an acquisition of the former by the latter. The Responsible Business team at Belron® International provided each of the Belron® businesses with support to promote this change and reinforce to employees the importance of speaking up. No instances of modern slavery were reported to Speak Up in the last 12-months (since our previous Modern Slavery statement).

The People team at Belron® International follow a rigorous recruitment process aligned to local employment law that includes carrying out appropriate checks regarding each individual’s eligibility to work and contracts of employment. We are committed to promoting a workforce free of discrimination and harassment and provide fair and equitable pay, benefits and other conditions of employment in accordance with local laws.

Assessing our activities

Belron® International and all the Belron® business units continue to use the EcoVadis assessment tool to measure and benchmark its Responsible Business approach. This helps us assess our policies; the actions to implement the policies; and the results, under four themes: environment, business ethics, labour practices and human rights, and sustainable procurement. The assessment survey is based on recognised international standards such as the Global Reporting Initiative, International Labour Organisation conventions, and the United Nations Global Compact Ten Principles of Responsible business. The Belron® International current score places the company in the top 5% of businesses in the same industry, as rated by EcoVadis.

Our supply chain

Belron® International sources and manages the procurement of certain core products and services required by the Belron® business units globally. Centrally procured products include vehicle glass, trims, adhesives, workshop equipment, tools, consumables, and products for resale. Centrally procured services include categories such as IT maintenance, professional services, and vehicle lease providers. Other products and services required by the Belron® business units locally are sourced and managed through their own local supplier network.

Suppliers that have a direct contractual relationship with Belron® International are classed as Tier 1 suppliers. Upstream suppliers of raw materials (and parts or components thereof) as well as other goods and services procured without such a direct relationship e.g. via an agent or other commercial partners, are classed as suppliers in Tier 2 or beyond.



The Tier 1 supply base is fully global covering 120 production sites and is based primarily on relationships with a small number of long-term commercial partners. In general these are large, well known multinational companies with global footprints. We also have some close relationships with smaller specialists.

In 2020 Belron® International established a new Sustainable Procurement programme with the purpose of embedding sustainability at the forefront of all purchasing strategies and buying decisions. The programme is structured around three key pillars:

- **Transparency**
 - Working towards achieving total visibility of the complete supply chain
 - Ensuring our suppliers have visibility of our requirements and expectations
- **Assurance**
 - Ensuring that required standards are being met, through remote and on-site assessments and audits
- **Reward**
 - Incentivising suppliers to improve
 - Awarding business based firstly on Sustainability performance
 - Recognising suppliers for outstanding achievements

To manage the new programme a team has been established at Belron® International, led by the Head of Sustainable Procurement, with dedicated resources and a ring-fenced budget. Identifying modern slavery risks and solutions in our supply chain is one of the top priorities of this important new programme as well as the measurement and management of other social and environmental sustainability risks.

As a key first activity of the programme, we launched a new [Supplier Code of Conduct](#) (the Supplier Code) for all Belron® International suppliers. It includes the high standards and expectations of all suppliers that must be met in order for an organisation to become and remain a supplier.

The Supplier Code is available via the Belron® website and has been communicated to all Belron® International Tier 1 suppliers. Each organisation is obliged to adhere to the standards set out in the document.

The Supplier Code includes a specific section (3.4) on modern slavery, stating our position as follows:

- We expect suppliers to comply with all applicable labour laws, and to respect and support the protection of human rights of workers as well as individuals and communities affected by their activities.
- Suppliers must never use or support practices that inhibit the development of children, and must not employ anyone under the age of 16 years or, where it is higher, the mandatory national school leaving age. Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- Suppliers must not use any form of involuntary labour including forced, prison or debt-bonded labour.



- Suppliers must not require workers to surrender any government issued identification, passport or work permit, or other personal documents, as a 'deposit' or condition of employment.
- Full compliance with any applicable Modern Slavery legislation or equivalent is essential, and suppliers must validate their employees' rights to live in the country in which they are based and provide a written contract of employment in a language understood by the employee.
- Where the supplier provides living quarters to employees, such quarters must be fit for purpose and meet all legal regulations. Additionally, employees must have the right and ability to leave the quarters as and when they wish.

The Sustainable Procurement programme aims to drive and incentivise supplier Sustainability performance, with those suppliers who demonstrate good performance and continuous improvement being favoured above others when it comes to awarding business. From 2022, the best suppliers will be formally recognised by Belron® International for sustainability excellence.

Our supplier due diligence

In the past 12 months, the Sustainable Procurement team has mapped the Belron® International Tier 1 supply chain covering all production sites of centrally procured goods and services. This has supplemented the Supplier Management Programme that was described and set out in the Belron® International 2020 statement and was done in order to have fuller transparency of all production locations globally. This exercise was completed in close collaboration with the suppliers and formally validated by them.

During the second half of 2021 we will be working with our Tier 1 suppliers to map our Tier 2 suppliers. By the end of 2021, we aim to begin mapping Tier 3 suppliers using a risk based assessment of modern slavery. We expect this work to continue through 2022.

All purchased products and services categories managed by Belron® International, have been through a desk-based modern slavery risk assessment to provide clarity on the level of potential risk present in each category and location, an exercise which is to be undertaken on an annual basis. The results of the risk assessment are used to prioritise and schedule bespoke independent on-site social and environmental audits.

An example of a highlighted potential risk: one goods category (professional grade rubber gloves "Nitrile Gloves") that are routinely used in the fitting of vehicle glass, was assessed as having a risk of modern slavery. This is due to a major part of its general global production being located in Malaysia. Belron® International conducted research in collaboration with its suppliers into the source of its procured Nitrile Gloves. It was found that Belron® International does procure Nitrile Gloves from Malaysia via a Tier 1 supplier based in Europe. A social and environmental audit, incorporating a modern slavery risk assessment has been arranged for the Malaysian site and will take place in Q.3 2021.

To support the new auditing approach we have developed a bespoke supplier social and environmental site audit, closely aligned with our purpose and values as reflected in the Supplier Code of Conduct that covers modern slavery in addition to health & safety, environment, labour and values. We have partnered with two world class, global audit providers, that have been selected to undertake



site audits and who will also provide advice and assistance to further develop the Sustainable Procurement programme.

The programme of site audits is now underway and will accelerate through Q.3 and Q.4 2021, with the aim of conducting audits on all Belron® International Tier 1 sites by the end of Q.3 2022. Going forward, all audited sites will be re-audited annually. A key aspect of the on-site audit is direct dialogue with workers at the production sites. This is done in local languages by the expert audit providers we use. Answers are anonymised and the results are communicated to Belron® International.

Any non-compliances found will be addressed in a timely manner and with vigour. If any instances of modern slavery are found at site level these will be reported to the Belron® International Board of Directors by the Head of Sustainable Procurement, with an appropriate action plan and timescales for improvements. They will also be detailed in the annual Modern Slavery Statement.

Following any non-compliance, the initial focus will be working with the supplier to resolve any issues, however we are also developing a Supplier Responsible Disengagement policy to formally cease trade with any suppliers who may demonstrate an unwillingness or inability to comply or to address any issues.

Training and awareness

To support the new Sustainable Procurement programme, we are committed to providing refresher training to all Belron® International employees and training to new employees as part of on-boarding, to be able to recognise modern slavery and help mitigate the risk of incidents. This training will be conducted in partnership with external providers that specialise in modern slavery and human trafficking awareness.

A handwritten signature in black ink, appearing to read "G. Lubner".

Gary Lubner, CEO

Date: 17-06-2021

Belron® International Limited Board

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Belron® International Limited during the financial year ending 31 December 2020 and was approved by the Board on 14 June 2021.

2020

STATEMENT



Belron International Limited

Modern Slavery: Our approach to making a difference

Our structure and business

Belron® is the worldwide leader in vehicle glass repair and replacement (VGRR) operating through wholly owned businesses and a network of franchises in 39 countries, across six continents. We own more than ten well-known brands in the industry including Carglass® across Europe, Autoglass® in the UK ([click to view their MSA statement](#)) and Safelite® in the USA and employ just under 30,000 people, over half of whom are highly skilled technicians. Building on existing capability and expertise, we have taken an industry-leading position in ADAS (Advanced Driver Assistance Systems) recalibration. Belron International Limited, based in the UK, acts as the global support centre for all our operations, which are each led and operated by an executive team. Belron exists to “make a difference with real care”, a clear purpose that is shared by every business wherever we operate.

We are signatory to the United Nations Global Compact (UNGC) and its Ten Principles of responsible business. This commits us, along with over 10,000 other businesses, to do business responsibly by aligning strategies and operations with the Principles in the areas of human rights, labour, environment and anti-corruption. The Principles are reflected in our ethical framework as well as our Supplier Code of Conduct. We produce a regular Communication on Progress report on how these principles are being embedded across the business ([click to view the latest report](#)).

The approach to implement these themes is left to each business with support and best practice guidance provided by Belron International. Our culture, which we call the “Spirit of Belron” is described by the following words: driven, collaborative, genuine and caring. These values and behaviours provide the foundation on which our programmes are implemented. We ensure that there is no inhumane treatment (including any form of forced labour, physical punishment or other abuse) of our people or of those in our supply chain wherever we operate.

To measure our progress against our corporate responsibility commitments we use an externally assessed sustainability tool provided by Ecovadis. The topics in the assessment are based upon international standards and conventions including the UNGC and the ILO. Each of the Belron businesses are assessed on the policies in place, the actions to implement the policies and the results of the actions in four areas: labour & human rights, environment, ethics and sustainable procurement. Based on the results of the most recent assessments, Belron is placed in the top 5% of more than 50,000 businesses that have been assessed.

Belron globally source products required for our core activities which includes windscreens and other vehicle glass and body parts, associated accessories, and the tools and consumables required for our operations. We also source products for re-sale and products for general use within our business such as IT and maintenance services. Each of our business units is responsible for the operation and management of its own supply chain.



Our approach

We have a central, cross functional team to assess and address the important issue of ensuring our business and supply chain is free of all forms of modern slavery. The team is made up of specialists from Procurement, Legal, Health & Safety and Corporate Responsibility.

The team collaborated in updating the Supplier Code of Conduct in this reporting year, in conjunction with feedback from third party experts. The Code is publicly available through the Belron website and clearly communicates our requirements and expectations to our global suppliers which includes our expectations in relation to human rights and labour conditions. Suppliers are required to comply with the Code of Conduct when they supply their products and services to us.

For Belron International recruitment, we follow a rigorous process that includes carrying out appropriate checks regarding each individual's eligibility to work in the UK. All employees follow an induction process that includes [Our Way of Working](#). This ethical framework describes the behaviours we expect of everyone who is employed by us and those we partner with. Our people are committed to ensuring that discrimination, harassment and bullying are all deemed unacceptable. We ensure that everyone's human rights are respected; relationships with our partners and suppliers are based on integrity; and we have a sustainable supply chain. Refresher training sessions and topic specific training are run periodically as required.

We encourage all our people to speak up if they witness any behaviour that concerns them. This can be done internally or through our independently managed "Speak Up" facility which enables people to raise concerns anonymously. All reports are investigated, and appropriate measures taken.

Our due diligence process

Belron has an official process for the on-boarding and management of suppliers, which covers all suppliers who have or wish to have, a contract with Belron for the supply of goods to Belron business units. Belron obtains products from almost 100 global supplier locations on a group wide basis and manages them through a Supplier Management Programme. All existing and new suppliers are obliged to complete the process in order to be an officially 'approved supplier'. The programme ensures that all suppliers of Belron are ethically compliant, financially stable, manage their risks, and comply with all legal requirements. This is done through a combination of on-site audits, external assessments and internal management. We believe we have a responsibility to ensure that our suppliers are fit for purpose and meet high ethical standards.

Each Belron business has its own process of managing the risk and sustainability criteria of its local suppliers. The process is evaluated through the Ecovadis assessment.

The Ecovadis tool is also used to assess our suppliers. During this reporting year, Group suppliers (managed by the Group Purchasing Team) completed an Ecovadis assessment, meeting the minimum score requirement. The assessment process was supported with the continued programme of on-site audits. Supplier audits are performed by both Belron and third-party experts, throughout the year. Suppliers are assessed for compliance with our Supplier Code of Conduct, our global way of working, and all relevant country specific legislation. This includes assessments of labour standards, health and safety, environment and business ethics across all types of workers including direct employees, labour provider workers, workers employed by service providers and workers provided by contractors.



Suppliers who successfully continue to pass the process are 'approved' for business, and any suppliers who fail the process are 'unapproved' and need to demonstrate corrective actions have been taken in order to regain their approved status.

The process has resulted in some new suppliers being rejected on Corporate Responsibility grounds, and existing suppliers being de-listed. It has also led to many improvements being made and demonstrated by suppliers in order to remain approved.

Results of supplier assessments are stored centrally and made available across the business. The Group Purchasing Team work closely with their suppliers on all areas of non-compliance or improvement opportunities in order to maintain ongoing development.

Training

Belron subscribes to a training programme with a training provider known as Procurement Academy. The programme includes training in relation to labour practices and members of our Procurement team are asked to complete this section.

To enhance knowledge and understanding of this subject, the cross functional team has undergone a tailored training session run by external providers that specialise in slavery and human trafficking awareness, and in partnership with our on-site auditor. The training provided the team with a knowledge and understanding of what modern slavery is, how it operates, how to prevent it, how to identify it, and what to do if you find it. We are taking the learnings from this to continue to work to develop improvements in our governance and processes.

A handwritten signature in black ink, appearing to read "G. Lubner", is positioned above the printed name of the CEO.

Gary Lubner, CEO

Date: 26 June 2020

Belron International Limited Board

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Belron International Limited during the financial year ending 31 December 2019 and was approved by the Board on 26 June 2020.

2019

STATEMENT



Belron International Limited

Modern Slavery: Our approach to making a difference

Our structure and business

Belron® is the worldwide leader in vehicle glass repair and replacement (VGRR) with operations in over 30 countries, across six continents. We own more than ten well-known brands in the industry including Carglass® across Europe, Autoglass® in the UK ([click to view their MSA statement](#)) and Safelite® in the USA and employ more than 30,000 people, over half of whom are highly skilled technicians. In some of our markets we have expanded into new services such as automotive damage vehicle repair and replacement, home damage repair and replacement and claims management which also require high technical skills. Belron International Limited, based in the UK, acts as the global support centre for all our operations, which are each led and operated by an executive team. Belron exists to “make a difference with real care”, a clear purpose that is shared by every business wherever we operate.

We have an active corporate responsibility approach aligned to the United Nations Global Compact’s Ten Principles of Responsible business under the themes of; environment, labour, human rights and anti-corruption. Principle 4 states that, “Businesses should support the elimination of all forms of forced and compulsory labour”. Each year we produce a Communication on Progress report on how these principles are being embedded across the business ([click to view the latest report](#)).

The approach to implement these themes is left to each business with support and best practice guidance provided by Belron International. Our culture, which we call the “Spirit of Belron” is described by the following words: driven, collaborative, genuine and caring. These values and behaviours provide the foundation on which our programmes are implemented. We ensure that there is no inhumane treatment (including any form of forced labour, physical punishment or other abuse) of our people or of those in our supply chain wherever we operate.

We benchmark our corporate responsibility commitments each year using an externally assessed sustainability tool - Ecovadis - which is based on the United Nations Global Compact Principles, ISO26000 Framework and the Global Reporting Initiative Standards. This programme assesses our policies, actions and results in the areas of environment, labour practices and human rights, fair business practices and sustainable procurement. Based on the results of the most recent assessment, Belron is placed in the top 15% of more than 45,000 businesses that have been assessed. Belron has a clear target that all its businesses will be Gold rated, with an average score of 70, within the next two years.

Belron globally source products required for our core activities which includes windscreens, paint and other vehicle glass and body parts, associated accessories, and the tools and consumables required for our operations. We also source products for re-sale and products for general use within our business such as labour, IT and maintenance services. Each of our business units is responsible for the operation and management of its own supply chain.



Our approach

We have a central, cross functional team to assess and address the important issue of ensuring our business and supply chain is free of any modern slavery. The team is made up of specialists from Procurement, Legal, Health & Safety and Corporate Responsibility.

We have a Supplier Code of Conduct, which includes our expectations in relation to human rights and labour conditions. Suppliers are required to comply with the Code of Conduct when they supply their products and services to us.

With regards to recruitment, we follow a rigorous process that includes carrying out appropriate checks regarding each individual's eligibility to work in the UK. All employees follow an induction process that includes [Our Way of Working](#). This describes the behaviours we expect of everyone who is employed by us and those we partner with. Our people are committed to ensuring that discrimination, harassment and bullying are all deemed unacceptable. We ensure that everyone's human rights are respected; relationships with our partners and suppliers are based on integrity; and we have a sustainable supply chain. Refresher training sessions are run periodically as required.

We encourage our people to speak up if they witness any behaviour that concerns them. This can be done internally or through our independently managed "Speak Up" facility which enables people to raise concerns anonymously. All reports to the "Speak Up" line are investigated and appropriate measures taken.

Our due diligence process

Belron has an official process for the on-boarding and management of suppliers, which covers all suppliers who have or wish to have, a contract with Belron for the supply of goods to Belron business units. All existing and new suppliers are obliged to complete the process in order to be an officially 'approved supplier'. Suppliers must prove they comply with both recognised international standards and our internal policies. The process includes the following elements:

- Remote audits of all suppliers
(this is done using the Ecovadis tool with a minimum score requirement of 45)
- On-site audits of selected key supplier sites
- In-house checks and validation of selected criteria
- Formal acceptance of the Belron Supplier Code of Conduct

Supplier audits are performed by both Belron and third party experts, and take place throughout the year. Suppliers are assessed for compliance to our Supplier Code of Conduct, our global way of working, and all relevant country specific legislation. This includes assessments of labour standards, health and safety, environment and business ethics across all types of workers including direct employees, labour provider workers, workers employed by service providers and workers provided by contractors.



Suppliers who successfully continue to pass the process are 'approved' for business, and any suppliers who fail the process are 'unapproved' and need to demonstrate corrective actions have been taken in order to regain their approved status.

The process has resulted in two potential new suppliers being rejected on Corporate Responsibility grounds, one existing supplier being de-listed, and has also led to many improvements being made and demonstrated by suppliers in order to remain approved.

Results of supplier assessments are stored centrally and made available across the business. Group purchasing teams work closely with their suppliers on all areas of non-compliance or improvement opportunities in order to maintain ongoing development.

Training

Belron subscribes to a training programme with a training provider known as Procurement Academy. The programme includes training in relation to labour practices and members of our Procurement team are asked to complete this section.

A handwritten signature in blue ink, appearing to read "G. Lubner", is written over a faint, light blue grid background.

Gary Lubner, CEO
Date: 24 June 2019

Belron International Limited Board

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Belron International Limited during the financial year ending 31 December 2018.

2018

STATEMENT

Belron International Limited

Modern Slavery: Our approach to making a difference

Our structure and business

The purpose of Belron® is to make a difference by solving people's problems with real care. We are the worldwide leader in vehicle glass repair and replacement (VGRR), employing more than 28,000 people, over half of whom are highly skilled technicians. We have operations in over 30 countries, across six continents and own more than ten well-known brands in the industry including Carglass® across Europe, Autoglass® in the UK ([click to view their MSA statement](#)) and Safelite® in the USA. In some of our markets we have expanded into new services such as automotive damage vehicle repair and replacement, home damage repair and replacement and claims management. Belron International Limited, based in the UK, acts as the global support centre for all our operations, which are each run and managed locally by an executive team.

We benchmark our corporate responsibility commitments each year using an externally assessed sustainability tool based on the United Nations Global Compact principles, ISO26000 framework and the Global Reporting Initiative. This programme assesses our policies, actions and results in the areas of environment, labour practices and human rights, fair business practices and sustainable procurement. Based on the results of the most recent assessment, Belron is placed in the top 15% of more than 45,000 businesses that were assessed.

Our culture, which we call the "Spirit of Belron", can be described using the following words: driven, collaborative, genuine and caring. We are a signatory to the United Nations Global Compact and are committed to embedding the 10 principles, set out by the initiative, across the business. In accordance with this, each year we publish our Communication on Progress ([click to view](#)). Principle 4 states that, "Businesses should support the elimination of all forms of forced and compulsory labour". We commit to this through Our Way of Working ([click to view](#)) and our corporate responsibility benchmarking programme. We support the implementation of the Articles of the United Nations Universal Declaration on Human Rights are assessed, prioritised and implemented. We strive to ensure that there is no inhumane treatment (including any form of forced labour, physical punishment or other abuse) of our people or of those in our supply chain.

Belron globally source products required for our core activities which includes, windscreens, paint and other vehicle glass and body parts, associated accessories, and the tools and consumables required in our operations. We also source products for re-sale and products for general use within our business such as labour, IT and maintenance services. Each of our business units is responsible for the operation and management of its own supply chain.

Our approach

We have a cross functional team to assess and address the important issue of ensuring our business and supply chain is free of any modern slavery. The team is made up of specialists from Procurement, Legal, Health & Safety and Corporate Responsibility.

We have a Supplier Code of Conduct, which includes our expectations in relation to human rights and labour conditions. Suppliers are required to comply with the Code of Conduct when they supply their products and services to us.

With regards to recruitment, we follow a rigorous process that includes carrying out appropriate checks regarding each individual's eligibility to work in the UK. All employees follow an induction process that includes Our Way of Working. This describes the behaviours we expect of everyone who is employed by us and those we partner with. Our people are committed to ensuring that discrimination, harassment and bullying are all deemed unacceptable. We ensure that everyone's human rights are respected; relationships with our partners and suppliers are based on integrity; and we have a sustainable supply chain. Refresher training sessions are run periodically as required.

We encourage our people to speak up if they witness any behaviour that concerns them. This can be done internally or through our independently managed "Speak Up" line. All reports to the "Speak Up" line are investigated and appropriate measures taken.

Our due diligence processes

Belron has implemented a new process for the on-boarding and management of suppliers. The scope of this process covers suppliers who have a contract with Belron. The process specifies what actions are to be taken during both bringing new suppliers on-board through contracts, and ensuring the supplier commits to adhering to Belron's Supplier Code of Conduct. The process specifies the steps to be taken for each supplier including

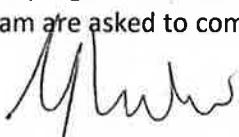
- On-site audits
- Online evidence based audits
- Self-assessment surveys
- In-house checks of selected criteria for all suppliers

Suppliers who successfully continue to pass the process are 'approved' for business, and any supplier who fails the process are 'unapproved' and would need to demonstrate corrective actions have been taken in order to regain their approved status.

Our programme of formal audits and site visits, are performed regularly by a member of our Procurement team and third party experts. Belron conducts a number of on-site supplier audits each year, during which the suppliers are assessed for compliance to both our Supplier Code of Conduct and all relevant country specific legislation. Audits cover labour standards, health and safety, environment and business ethics. The scope of the audits include all types of workers including direct employees, labour provider workers, workers employed by service providers and workers provided by contractors. The audits raise all areas of non-compliance and include them in a corrective action plan report which is followed up to ensure they are all addressed and actioned to a satisfactory level.

Training

Belron subscribes to a training programme with a training provider known as Procurement Academy. The programme includes training in relation to labour practices and members of our Procurement team are asked to complete this section.



Gary Lubner, CEO

Date: 11 JUNE 2018

Belron International Limited Board

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Belron International Limited during the financial year ending 31 December 2017.

2017

STATEMENT

Belron International Limited

Modern Slavery: Our approach to making a difference

Our structure and business

Belron® makes a difference by solving people's problems with real care. We are the worldwide leader in vehicle glass repair and replacement (VGRR), employing more than 25,000 people, over half of whom are highly skilled technicians. We have operations in over 30 countries, across five continents and own more than ten well-known brands in the industry including Carglass® across Europe, Autoglass® in the UK (*view the Autoglass® MSA statement*) and Safelite® in the USA. Belron International Limited, which is based in the UK, acts as the global support centre for all our businesses, which are each managed locally by an executive team.

Our culture, which we call the "Spirit of Belron", can be described using the following words: driven, collaborative, genuine and caring. We are a signatory to the United Nations Global Compact and are committed to embedding the 10 principles, set out by the initiative, across the business. In accordance with this, each year we publish our Communication on Progress. Principle 4 states that, "Businesses should support the elimination of all forms of forced and compulsory labour". We commit to this through Our Way of Working and our corporate responsibility benchmarking programme. We ensure that the Articles of the United Nations Universal Declaration on Human Rights are assessed, prioritised and implemented. We strive to ensure that there is no inhumane treatment (including any form of forced labour, physical punishment or other abuse) of our people or of those in our supply chain.

We benchmark our corporate responsibility commitments each year using an externally assessed sustainability tool based on the United Nations Global Compact principles, ISO26000 framework and the Global Reporting Initiative. This programme assesses our policies, actions and results in the areas of environment, labour practices and human rights, fair business practices and sustainable procurement.

We globally source products required for our core activities in vehicle glass repair and replacement. This includes, windscreens, other vehicle glass parts, associated accessories, and the tools and consumables required in our operations. We also source products for re-sale and products for general use within our business. Each of our business units is responsible for the operation and management of its own supply chain.

Our approach

We have a cross functional team to assess how best to address modern slavery. The team is made up of specialists from Procurement, Legal, Health & Safety and Corporate Responsibility.

We have a Supplier Code of Conduct, which includes our expectations in relation to human rights and labour conditions. Suppliers are required to comply with the Code of Conduct when they supply their products and services to us.

With regards to recruitment, we follow a rigorous process that includes carrying out appropriate checks regarding each individual's eligibility to work in the UK. All employees follow an induction process that includes Our Way of Working. This describes the behaviours we expect of everyone who is employed by us and those we partner with. Our people are committed to ensuring that

discrimination, harassment and bullying are all deemed unacceptable. We ensure that everyone's human rights are respected; relationships with our partners and suppliers are based on integrity; and we have a sustainable supply chain. Refresher training sessions are run periodically as required.

We encourage our people to speak up if they witness any behaviour that concerns them. This can be done internally or through our independently managed "Speak Up" line. All reports to the "Speak Up" line are investigated and appropriate measures taken.

Our due diligence processes

We provide suppliers with our Supplier Code of Conduct and expect them to comply with its requirements. On-going adherence with our Supplier Code of Conduct for existing suppliers is ensured through a programme of formal audits and site visits, which are performed regularly by a member of our Procurement Team and third party experts. The audits include observing labour practices and contain procedures for any observed risk or non-compliance. The supplier must follow and fully rectify any non-compliance.



David Meller
Director
Belron International Limited Board

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Belron International Ltd during the financial year ending 31 December 2016.