

Code of Conduct

for the Belron® Group



**Our way
of working**

Welcome to our Code of Conduct



Our brands

**BELRON**

**AUTOGLASS**
SPECIALS

**APPLE**
Auto Glass

**O'Brien**

**Lebeau**
vitres d'autos

**CARGLASS**

**Laser**

**Laddaw**

**DURO**
vitres d'autos

**Vanfax**

**Safelite**

**HURTIGRUTA**
CARGLASS

**AUTOGLASS**

**Smith & Smith**
SINCE 1875

**ORIGLASS**
ULTRA PER AUTO

**Speedy Glass**

All above listed brands and logos are registered Trademarks of Belron Group SA and its affiliated companies.

Contents



Introduction



Welcome from our CEO, Carlos Brito **1.0**
About this Code of Conduct **1.1**

Our customers and partners



Delivering world-class customer care **4.1**
Building relationships with suppliers and partners **4.2**
Avoiding bribery and corruption **4.3**

Speaking up



Speaking up **2.0**

Our society



Respecting the environment **5.1**
Protecting human rights **5.2**

Our colleagues



Embracing our differences and treating everyone with respect **3.1**
Keeping everyone safe and well **3.2**
Avoiding drugs and alcohol misuse **3.3**
Using company assets and confidential information the right way **3.4**
Avoiding conflicts of interest **3.5**

Our business



Competing fairly **6.1**
Keeping accurate records **6.2**
Safeguarding personal data **6.3**
Preventing fraud and money laundering **6.4**
Complying with Trade Sanctions **6.5**
Protecting our reputation **6.6**



We are the world's leading vehicle glass repair, replacement and recalibration company, operating across the globe as a family of businesses. With over 30,000 colleagues serving millions of customers in around 40 countries, it is critical that we are guided by a clear and consistent Code of Conduct to ensure we all meet the highest standards of integrity and ethics.

How we do business today can be traced back to our roots in South Africa over 100 years ago. Our story began in the 1890s with our first mobile service using a bicycle to deliver glass to customers. During the 20th century we grew across the world with the same core values and beliefs.

At the heart of our success is every one of us – people who are passionate about “Making a memorable difference with care”, living our values every day in everything we do. It is our greatest strength. Therefore, all of us have a responsibility to read, understand and adhere to this Code of Conduct – without exception. It sets out the standards for us all to meet, anywhere we work in the world where our businesses operate.

It is equally important that you feel confident to speak up without fear of retaliation if you believe this Code of Conduct has been breached, by reporting to leaders in the business or by confidentially using your local businesses' Speak up hotlines.

I'm proud to lead Belron and continue, with you, to operate to the highest ethical standards taking the business from strength to strength and building an even better Belron. It is up to all of us to make sure Belron remains a special place to join and work.

Carlos Brito

CEO

Belron is a special place

About this Code of Conduct

This Code of Conduct applies to everyone at Belron regardless of job role, location or seniority. It applies whether employed permanently or temporarily across all our family of businesses.

It builds on our core values by detailing the expected behaviours and actions that shape how we work, ensuring we focus not just on “what” we do, but “how” we do it. It supports and guides us in our day-to-day decisions. It also makes clear what we can all expect from working here, and what to do if things aren’t right.

The Code of Conduct is structured around four key areas of responsibility: to our colleagues, to our customers and partners, to society and to our business. Each area has different topics which detail what we expect from the company under “**At Belron we...**” and what is expected of us under “**All of us can make a difference by...**”.

Although this Code of Conduct sets out the minimum standards we must all adhere to globally, your local country policies may go further and it is important that you also understand how local guidelines, policies and expectations in your country may affect you.

There will of course be situations and circumstances which are not directly covered in this document. To guide your actions, you should always ask yourself the following questions:

- **Is what I’m doing legal?**
- **Is it in line with this Code of Conduct and the Spirit of Belron?**
- **Could I explain my actions comfortably if asked by a friend or family member?**
- **Is what I’m doing protecting the company’s reputation and in the company’s best interests?**

Asking yourself these questions before you act will allow you to better evaluate choices and make decisions. If you answer ‘No’ or ‘I’m not sure’ to any of these questions you must STOP and seek advice.

Breaching this Code may result in disciplinary action which in the most serious cases could result in termination of employment or contract.

If you have any questions about your responsibilities or any of the information in the Code of Conduct, please ask your manager, Human Resources or Legal teams.

Glossary

Manager

People Leader, Line Manager

Colleague

Employee, Associate

Human Resources Team

People Team, People & Leadership Team, People & Culture Team

Speak Up Line

Speak up, Whistleblowing, Speak up Hotline, Ethics Hotline

The Spirit of Belron



We are driven

We believe in going the extra mile



We are caring

We believe in taking care of all our stakeholders in both what we do and how we do it



We are genuine

We believe in acting with respect and integrity for others



We are collaborative

We believe that we are stronger together

Speaking up

We all have a responsibility to speak up and raise concerns about possible breaches of the law, Group and local policies, or this Code of Conduct. If you see things that don't look right, or if you 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 you to do so.



If you have a legal or ethical concern or question we hope that you will feel able to raise it in the first instance with your manager or another manager that you trust. All managers have a responsibility to listen and respond appropriately. You can also speak to your Human Resources team. Any issue raised in good faith will be acted on sensitively and appropriately.

However, we realise that sometimes individuals have concerns that they feel more comfortable raising outside the business so, in addition to the mentioned channels, we have set up specialist third party operated telephone lines and web-based solutions that are available for anyone to call or contact. These Speak Up lines enable anyone to report any concern, including anonymously if the individual wishes. Any Speak Up report will be shared by the third party with senior members of the business' legal team who will determine next steps, including how the report should be investigated. We aim to investigate all reports promptly and, usually once the investigation is complete, to give the individual who reported their concern, feedback on the investigation through the Speak Up line portal.

Whatever the route taken to speak up about a concern, Belron has a responsibility for ensuring that anyone who does raise a concern is free from any retaliation or reprisal.

Look out for the logo!

Throughout this Code of Conduct you'll see the **"DON'T FORGET TO SPEAK UP"** logo, which means it's particularly important that you raise any concerns or problems.

If you raise a concern about any of the topics you read about in this Code of Conduct, you are doing the right thing and your concern will be handled promptly and appropriately. All concerns made in good faith will be investigated. If it isn't, or if you suspect that any form of reprisal is taking place, you should let us know immediately. Any suspected retaliation or intimidation will not be tolerated and should be reported to your manager or Human Resources team.



Know where to go for help

The hotline is operated by an independent reporting service. You can report your concerns confidentially and anonymously, anywhere in the world and in your local language, as follows:

Australia	1800 831 230
Austria	0800 281462
Belgium	0800 79 683
Canada	(844) 955 1646
Denmark	80 25 40 97
Finland	0800 413708
France	0 800 91 09 68
Germany	0800 1862206
Ireland	1800 456 833
Italy	800 582 755
Luxembourg	80 02 49 58
Netherlands	0800 0230153
New Zealand	0800 753 248
Norway	800 62 311
Portugal	800 180 836
Spain	900 999 371
Sweden	020 88 85 70
Switzerland	0800 896 145
UK	0800 069 8189
USA	1800 913 7183

Online via: belron.ethicspoint.com
(not for use in USA)

Our colleagues

Together we ARE Belron. Whichever brand and wherever we work, we all make Belron what it is. We recognise and celebrate everyone's skills, passion, expertise and commitment to making a difference, as loudly and as often as possible.

Together we form a unique culture. It makes us stronger, creating a bond between us wherever we may be. At the same time, while we are united in our beliefs and values, we also respect each other as individuals, and celebrate our diversity. We believe that everyone's uniqueness is what makes the difference.

3.0 Our colleagues

3.1 Embracing our differences and treating everyone with respect

3.2 Keeping everyone safe and well

3.3 Avoiding drug and alcohol misuse

3.4 Using company assets and confidential information the right way

3.5 Avoiding conflicts of interest



Embracing our differences and treating everyone with respect

We are committed to being an inclusive place to work, with equal opportunities for everyone. We should all expect to work in an environment free of discrimination, where we can feel happy, fulfilled and able to reach our full potential. Our rich diversity of insights, talent, and experience makes us better at helping our customers and each other.

At Belron we...

- have zero tolerance for discrimination and stand for 100% inclusion for everyone
- believe that everyone's uniqueness is what makes the difference
- actively encourage diversity in all its forms
- celebrate that we comprise many different countries and cultures
- will take appropriate action against any discriminatory, derogatory, hostile or offensive conduct, including physical or verbal threats



Everyone at Belron should feel safe and empowered to speak up. If you feel discriminated against, harassed, or that you have been retaliated against, it's important to speak up, no matter who is involved. In addition, if you see or hear discrimination, harassment, or any inappropriate behaviour, don't accept it, let us know – you will be supported."

Susan Ormiston

Chief People Officer
Belron

All of us can make a difference by...

- behaving respectfully and courteously to everyone you encounter
- taking responsibility for becoming more informed about Diversity, Equity & Inclusion, through any training on offer
- taking feedback seriously and taking responsibility for how you behave toward others
- always raising any bullying, harassment, or inappropriate behaviour
- speaking to your manager or HR if you hear or see something that makes you feel uncomfortable or upset, or if you feel excluded for whatever reason



Managers have additional responsibilities

If you are a manager, you have a responsibility to take any employee concerns seriously. Make sure you are familiar with the policies in your business and speak to the Human Resources team if you need support.



Keeping everyone safe and well

At Belron, everyone's safety and wellbeing will always come first. We have a duty of care to provide a safe working environment and our ambition is for zero-harm, so we can all work safely every day whatever our location or type of work.

At Belron we...

- are committed to providing a safe and secure workplace, including providing the right personal protective equipment (PPE), tools and training
- aim to ensure everyone takes responsibility for making sure we are safe at work every day, reducing injuries and managing safety, health and wellbeing risk
- have high standards in health and safety management and practices to build a strong safety culture
- have local Employee Assistance Programmes in our businesses to support anyone who is facing difficulties

Safety and wellbeing include respecting each other's physical health and also mental and emotional health. We want everyone to be supported by the highest standard of health, safety and wellbeing procedures.

We expect everyone to play their part in this, by being alert to potential risks, taking responsibility for acting on them and reporting when things go wrong.



Keeping everyone safe and well

Continued

All of us can make a difference by...

- 1 striving to prevent accidents, injuries or work-related illnesses by following safe systems of work and wearing any PPE (personal protective equipment) provided to you
- 2 reporting any hazards, risks or weaknesses in your training or procedures to your manager
- 3 challenging any potentially unsafe work practices as soon as you see them
- 4 reporting all accidents, near misses and work-related illnesses to your manager appropriately in accordance with any applicable local policies
- 5 looking out for any possible security risks (physical or virtual), and reporting them
- 6 speaking to your manager if you are concerned about your own or a colleague's wellbeing



Managers have additional responsibilities

As managers you need to go the extra mile to safeguard everyone's safety at all times:

- set a great leadership example of a 'safety first' culture by understanding your local Health and Safety practices and demonstrating them consistently
- understand and manage the hazards and risks present in your workplace
- make sure everyone knows about safety, health and wellbeing procedures, and is able to access them
- make sure everyone has the right training, and that accurate records are kept
- record and report accidents, near misses and work-related illnesses appropriately in accordance with any applicable local policies including following escalation requirements for the most serious incidents
- if you are concerned about the wellbeing of someone in your team, guide them to your local Employee Assistance Programme or seek guidance from Human Resources



Avoiding drug and alcohol misuse

At Belron, we have a duty to protect the safety and wellbeing of all our stakeholders. Working under the influence of drugs or alcohol will affect our performance and put ourselves and those around us at risk. As part of our responsibility to providing a safe working environment, it is prohibited to undertake work or operate a vehicle while under the influence of drugs or alcohol.

At Belron we...

- have very strict rules about drugs and alcohol. Consuming, possessing, or being under the influence of drugs or alcohol at work is prohibited, including in company vehicles
- may occasionally allow alcohol at company-sponsored events, but expect everyone to always exercise both moderation and to behave respectfully towards each other
- strictly forbid taking or possessing illegal drugs or substances at work events or at any of our premises

All of us can make a difference by...

- 1** being responsible for your own safety, health and actions so you never put yourself or others at risk
- 2** never undertaking work while under the influence of drugs or alcohol
- 3** letting your manager know if you think one of your colleagues may be under the influence of drugs or alcohol
- 4** making sure you understand the local policies relating to alcohol and drug misuse in your business
- 5 Support**
If you think you need support in dealing with drug or alcohol issues, you can seek help through your local Employee Assistance Programme (EAP) or if comfortable speak to your manager.



Using company assets and confidential information the **right way**

To help us deliver exceptional service for our customers, we need the right resources and information to be used for legitimate and authorised business use. These are known as company assets which are both physical property but also intellectual property.



Physical items are products, tools, and equipment we use to carry out our work. It also includes intellectual property which includes confidential information such as reports we write and the business data we collect.

Company money is an asset and we should always think carefully about whether and how to spend it.

The trademarks, patents and copyright material owned by our business must also be actively protected. Anything created, designed, or made while at work is considered intellectual property and a company asset.

It is critical we do not misuse or act carelessly with company assets, which could put our customers, ourselves, and the business at risk. We must also be vigilant in ensuring other third parties do not misuse our assets such as by infringing our trademark.

At Belron we...

- invest in everyone having the right tools to deliver a great service
- provide information and training on how to use tools and equipment safely and correctly
- will not tolerate the use of company assets for illegal purposes, personal gain or profit by colleagues or third parties



Using company assets and confidential information the **right way** Continued

All of us can make a difference by...

- only using company assets, such as your tools, for legitimate and authorised business reasons
- ensuring you look after the tools and equipment you are responsible for, by keeping them safe and secure and not allowing anyone unauthorised to use them
- understanding your local Acceptable Use guidelines in relation to IT equipment
- following guidance on IT security measures in place (such as locking your device when away from your desk) and undertaking relevant training available
- taking care not to leave devices in public
- being cautious about what information you share with others and ensuring compliance with guidelines on the use of personal data and intellectual property.
- never leaving confidential information unattended and never speaking about confidential information in public
- being sure that external parties are bound by confidentiality agreements before you share confidential company information.
- reporting any misuse of company assets, confidential information or intellectual property including trademarks to your manager or legal department
- only spending company money for legitimate and necessary purposes, including expenses



If you are a manager, make sure your team have the right skills, knowledge and training to use the assets provided.



What is intellectual property?

Intellectual Property means all intangible property that can be protected by law, and includes your company's patents, trademarks, copyrights and trade secrets.

Avoiding conflicts of interest

Conflicts of interest can occur when an individual's own interests or external relationships interfere or compete with the interests of our business. We all have interests and relationships inside and outside of work but occasionally we may find ourselves in a situation where this may affect our ability to make decisions objectively. We know that colleagues may have or develop personal relationships in the work place. However, where a close personal relationship involves a manager and a direct or indirect report, or where there is the potential to create a conflict, this must be declared to your manager or HR. These actual or potential conflicts must be disclosed to protect both the individual and the business.

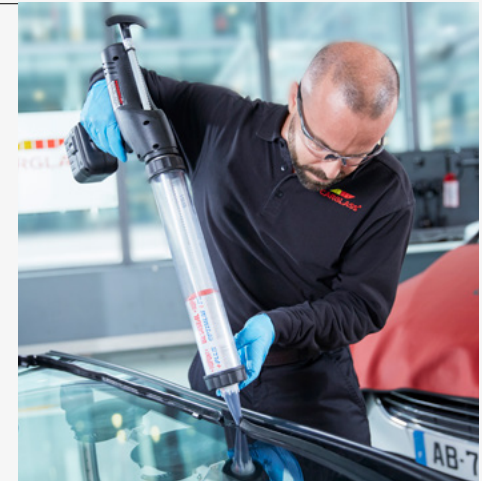
At Belron we...

- expect any personal interest, internal or external relationship that may conflict with an individual's role to be declared as soon as possible
- recognise that in the majority of instances, an actual or potential conflict can be resolved for both the individual and business, if it's dealt with in an open and transparent way
- will investigate any conflict of interest that has not been openly disclosed



All of us can make a difference by...

- ✓ always acting in the best interests of the business
- ✓ being aware of situations in which a conflict of interest can arise
- ✓ involving your manager by declaring any potential conflicts of interest
- ✓ ensuring you are never solely making business or employment decisions concerning a friend or relative
- ✓ declaring any business, political or charitable interests that could impact or create a distraction from your role with the company



Examples of a conflict of interest include:

- awarding work or giving employment to a family member or friend
- working for or owning an interest in a competitor, customer or supplier
- having a close friend or relative working for a competitor, customer or supplier

Our customers and partners

Our success is founded on delighting our customers every time we serve them. This is built upon the trust they have in our service and our integrity as a global brand. Our teams around the world are committed to delivering world-class customer care. We will always look to continuously improve our customers' experience by monitoring the quality of the materials we use and the service we deliver.

Also critical to our success are the strong relationships we have with our trusted suppliers and business partners who enable us to deliver service and value to our customers.

4.0 Our customers and partners

4.1 Delivering world-class customer care

4.2 Building relationships with suppliers and partners

4.3 Avoiding bribery and corruption



Who are our customers?

The customers we serve are motorists and also insurance companies, agents, brokers, lease and fleet operators, and other motoring organisations who buy our services.



Delivering **world-class** customer care

Integrity, respect and trust are at the heart of the relationships we have with our customers.

We are committed to delivering exceptional service where we Make a memorable difference with care. This is reflected in our outstanding Net Promoter Scores (NPS), which is a measurement of customers' likelihood to recommend us because of the quality of our service.

At Belron we...

- strive for every job we complete across the world to meet the same high standards, by using our expertise and technical excellence
- provide the training and support to deliver our best-practice approach to repairing, replacing and recalibrating (ADAS) vehicle glass known as the 'Belron Way of Fitting'
- only purchase high quality materials and ensure high quality standards
- always listen to customer feedback and look to put right any concerns and complaints if things go wrong



All of us can make a difference by...

- 1 keeping customers informed at every stage
- 2 treating all customers with equal courtesy and respect
- 3 remembering that customers often come to us in times of distress, and we can make a huge difference to how they feel
- 4 owning up to any mistakes made, including damage to a customer's vehicle. Mistakes will happen from time to time, and you will be supported to make things right
- 5 taking customer feedback seriously with the support of your manager
- 6 for the most serious quality issues that may arise, notify your manager or senior leader as soon as you become aware, following escalation requirements



Making a memorable difference with care

66

This is much more than just a job. I try to connect with my customers on a personal level."

Joe Milligan

USA – Safelite®
(Best of Belron Winner 2022)

Building relationships with suppliers and partners

Our commitment to maintaining the highest ethical standards also applies to our suppliers and supply chains. At Belron we operate safely, act with integrity and are trusted to deliver excellence. We need the support of our partners, our suppliers and that of our broader supply chain, to ensure that we are able to live up to these promises and continue to be successful together.

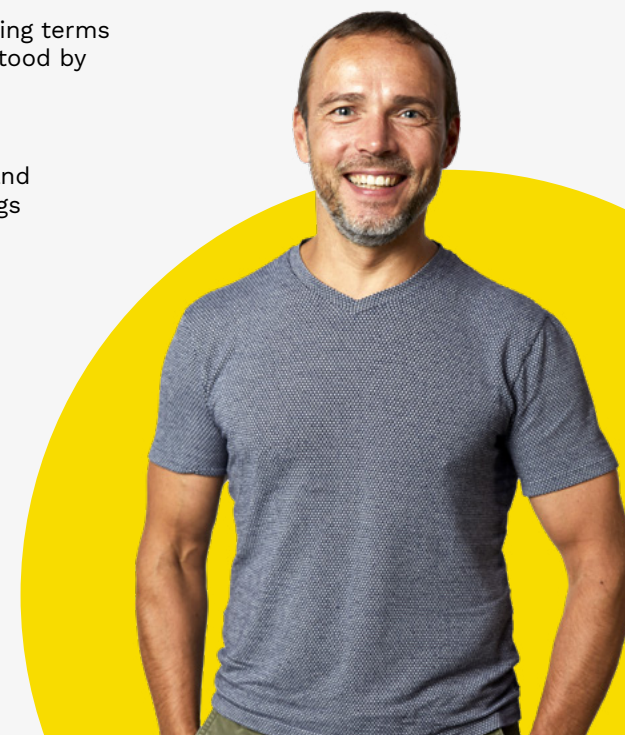
The Belron Supplier Code of Conduct sets out the minimum level of behaviours, practices and standards that need to be demonstrated and complied with by our suppliers and in turn, their suppliers and further supply chains. This is a fundamental requirement of conducting business with Belron.

At Belron we...

- expect all of our suppliers to comply with the Belron Supplier Code of Conduct and ensure that their suppliers and supply chains also meet these standards
- choose our suppliers based on clear and fair processes without bias or favouritism
- will select suppliers who meet our business and commercial requirements but also who demonstrate socially, ethically and environmentally responsible standards of working
- collaborate together to harness our collective expertise and deliver the most effective impact
- pay our partners in line with our contractual and legal obligations

All of us can make a difference by...

- 1 reading and understanding the Belron Supplier Code of Conduct if relevant for your role
- 2 using any relevant selection and vetting processes when selecting a supplier or business partner
- 3 making sure purchasing terms are clear and understood by all parties
- 4 being open, honest and fair in all your dealings
- 5 treating any data or information confidentially and in line with relevant data protection regulations
- 6 challenging any activity that goes against our principles



Avoiding bribery and corruption

Bribery and corruption are extremely serious matters, often with serious consequences for those involved. That's why it is important to understand the rules, and understand what is and isn't acceptable business activity, such as dealing with gifts and hospitality.

A bribe is anything of value that is offered, given or accepted in order to improperly influence someone to do something in exchange for something in return. It can take many forms including cash, vouchers, gifts, favourable terms for services, hospitality or personal favours. A gift is anything of value, and hospitality is food, drink, travel, accommodation, entertainment, cultural or sporting events.

Gifts and hospitality can be appropriate to be offered or accepted if occasional, reasonable and extended as a legitimate business courtesy. However, it is important that we all understand what is acceptable.

At Belron we...

- will not tolerate bribery and corruption in any form, including the use of facilitation payments to influence routine government or official actions
- never offer or accept gifts or hospitality of value to improperly reward or influence somebody else
- will never penalise anyone for rejecting a business opportunity if the relationship could involve bribery or corruption
- have guidelines for the giving or receiving of occasional proportionate gifts or hospitality for legitimate business reasons, and to ensure that gifts and hospitality aren't misunderstood as being an attempt to influence or bribe

All of us can make a difference by...



speaking up if you suspect something improper. Letting your manager or your local Legal team know if you see or suspect an action outside your anti-bribery and corruption policy or gifts and hospitality policy



complying with Belron's Global Anti-Bribery and Corruption including Gifts and Hospitality Policy, and any local business unit's anti-bribery and corruption policy and gifts and hospitality policy, applicable to you



informing your manager or people leader and local Legal team immediately, if you ever find yourself in a situation where you feel that making a payment or giving another benefit is unavoidable. They will be able to provide advice and support



following the guidelines on what gifts and hospitality you must record, and the approvals that need to be obtained, including guidance around monetary values



ensuring you seek company approval for dealing with any kind of government or public official that may be considered as lobbying

Our society

We are committed to doing business responsibly and to minimising our environmental impact throughout our business and beyond. All our family of businesses extend the life of windscreens and ultimately of vehicles. We do this through our 'repair first' approach and through glass replacement and recalibration of Advanced Driver Assistance Systems (ADAS).

We have a long tradition of serving society as part of our purpose in "Making a memorable difference with care" by supporting people and their wider communities and encouraging our people to get involved and to give back to our communities.

5.0 Society

5.1 Respecting the environment

5.2 Protecting human rights



Respecting the environment

Our planet is precious. Doing business responsibly includes our commitment to minimising our impact on the environment by reducing waste and driving down our emissions to zero. We can all play a part by taking into account the environment in our everyday work, whether in an office, a branch or store or when driving our vehicles.

We are working to ensure the products we use in our business are only made from materials that are sourced responsibly. We also ask our key suppliers to provide information on the raw materials they use in their supply chain.

At Belron we...

- have set clear ambitions and targets to **reduce waste, drive down emissions and build a circular economy**
- eliminate waste in line with our glass recycling and 'repair first' strategies
- are actively reducing our emissions to zero from our branch and store network, service centres, distribution centres and mobile fleet
- support the low-carbon transition by investing in renewables and carbon offsets
- expect our suppliers to minimise negative environmental impact through minimising energy consumption, pollution and waste, and striving to make all packaging sustainably sourced, made from recycled materials, and is recyclable wherever possible

All of us can make a difference by...

To reduce our impact on the environment we need to look at every aspect of how we do business and ask ourselves whether we can do better. Each of us can play a part in protecting the planet by doing some simple things every day:

- ✓ following the recycling practices in your workplace
- ✓ disposing of waste responsibly and in line with local regulations
- ✓ operating motor vehicles in a way that reduces fuel consumption and not leaving vehicle engines running while stationary
- ✓ challenging practices that are wasteful and suggesting how they might be improved
- ✓ reporting any incidents where you suspect a company policy has been broken



Managers have additional responsibilities

As a manager, you play an important part in our commitment to the environment by:

- ensuring work practices are efficient and sustainable, e.g. making sure work routes are well planned and fuel efficient
- ensuring we meet the requirements of our Supplier Code of Conduct in our dealings with suppliers

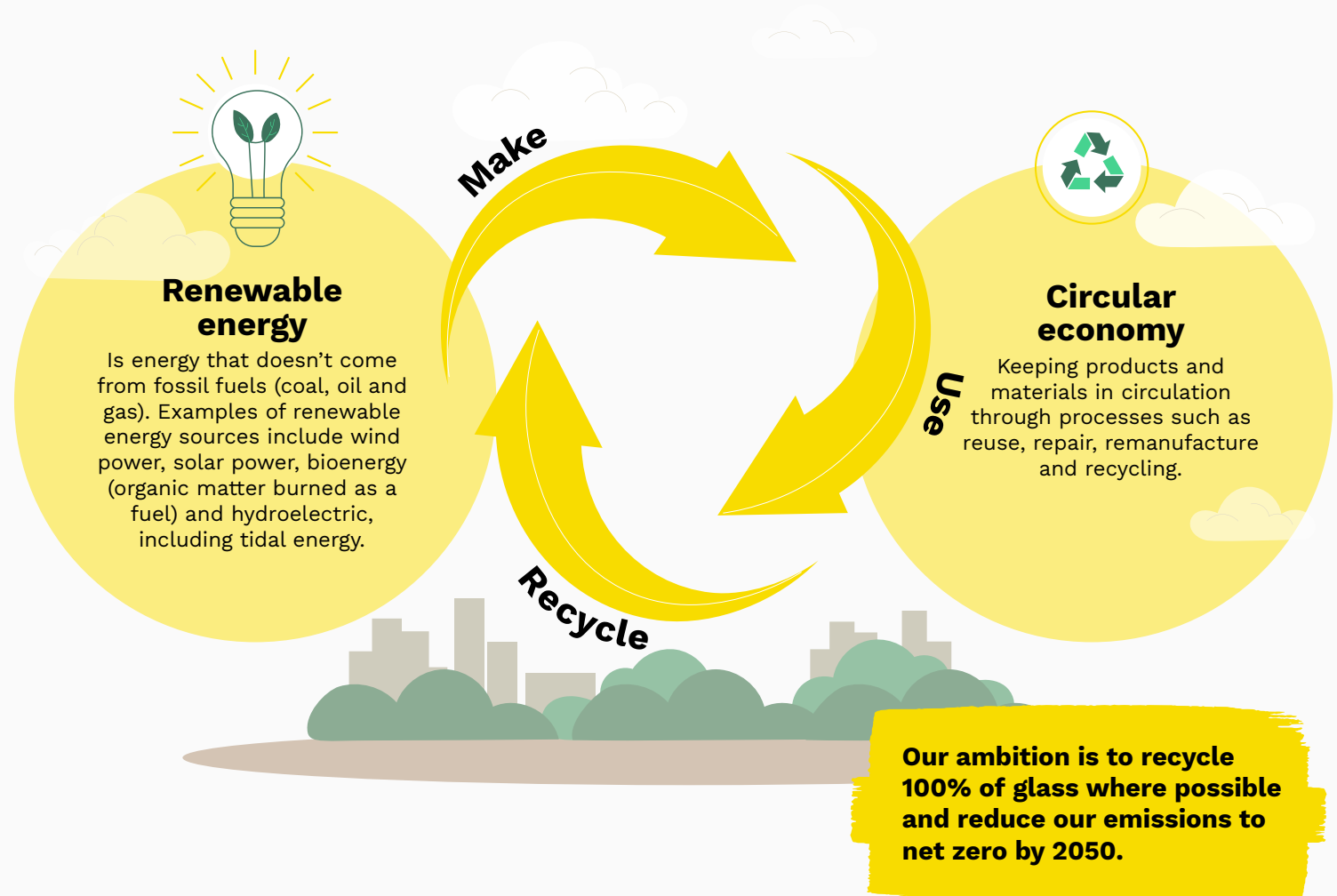
Respecting the environment Continued



I'm proud to work for a company that tries to reduce its impact on the environment. Taking action on climate change is the right thing to do, and by committing to reduce our carbon emissions to zero we're making a difference. Waste is also a hot topic, but we take steps to ensure the glass from our customers' vehicles is recycled. We're trying to think sustainably in everything we do – for example, the glass and the laminate film in windscreens can be used to make other products.”

Laust Pedersen

Technician
Denmark



Protecting human rights

We believe in upholding the human rights of everyone within our own business operations and supply chain. We have a duty to ensure that our operations do not contribute directly or indirectly to any human rights abuses. We want to play our part in creating a more responsible, equitable and sustainable future for society.

At Belron we...

- 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 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
- will not tolerate any form of human trafficking such as forced or bonded labour in any part of our operations or supply chain
- do 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



All of us can make a difference by...

We can all contribute to create a more responsible, equitable and sustainable society.

1

Respect

respecting the rights of everyone within our business and supply chain and reporting any breach or suspected breach of human rights immediately to your manager or HR

2

Identify

checking that all potential employees have the right to work before employing them, if part of your role

3

Apply

applying the standards of the Supplier Code of Conduct when selecting business partners, if part of your role

Our business

We all want to do a great job for our people, our customers, society and our shareholders.

As part of the Belron family, we all play a part in our continued success by doing business the right way every day. By following our processes, guidelines and policies, we all help to ensure the smooth running of our business and uphold our values and reputation.

6.0 Our business

6.1 Competing fairly

6.2 Keeping accurate records

6.3 Safeguarding personal data

6.4 Preventing fraud and money laundering

6.5 Complying with Trade Sanctions

6.6 Protecting our reputation



6.1

Making a difference for our business

Competing fairly

Competing and winning business is what makes us successful. However, it must always be done lawfully, ethically and allow for fair competition. Competition law, sometimes known as anti-trust law, is defined in all countries and is designed to uphold fairness in business and provide consumers with freedom of choice. These laws ensure that businesses don't obstruct each other's operations; or work together to restrict the market and competition unfairly. This applies to competitors, customers, suppliers and distributors.

At Belron we...

- respect and comply with Belron's Group Competition Law Policy and all competition laws through everything we do
- provide support and guidance through our legal teams to ensure that business practices, contracts and marketing activities are compliant
- will make clear through our guidelines, policies and training how we are able to compete fairly, legally and ethically in our markets
- compete fairly based on our many merits as a business, including the quality of our services and products



All of us can make a difference by...



What are examples of not competing fairly?

Examples of anti-competitive behaviour are bid rigging, market sharing and agreeing or fixing prices with a competitor. Penalties can be severe and could result in criminal proceedings for the company and individuals involved. There are huge fines in the most serious cases.



- ensuring you understand and comply with Belron's Group Competition Law Policy and all competition (anti-trust) laws and policies in your country
- not engaging in behaviour that might restrict competition and/or distort the market, such as fixing prices with a competitor, market-sharing and bid-rigging with competitors
- never using Belron's position in the market to unfairly win business
- never making false claims or remarks that unfairly disparage competitors, or improperly interfering with a competitor's business relationships
- never engaging in any contact with competitors where prices, costs, margin, commercial contract terms or customers are discussed
- ensuring all scheduled competitor conversations have a legitimate purpose and are approved in advance
- stopping and reporting any conversations you believe may be in breach of relevant policies, such as someone trying to obtain information on sensitive topics like pricing structures
- seeking advice from your Legal department if you have any doubts

Keeping **accurate** records

The accurate recording and reporting of information, business and financial records are crucial to running our business legally and responsibly. Accurate records are necessary to ensure we can fulfil legal and regulatory requirements, such as to tax authorities and to our auditors.

This applies to all information, including but not limited to, our monthly accounts, sales figures, contracts and personal expenses claims, as well as non-financial information such as time or attendance records or supplier audits.

At Belron we...

- create and maintain accurate business and financial records in order to fulfil legal and regulatory requirements
- willingly provide all necessary information to auditors
- prohibit the falsification of company records including backdating, altering or omitting records required for external review. We will investigate and act upon any violation which may result in disciplinary action



All of us can make a difference by...



being conscientious in your own record keeping – ensuring they are accurate, complete and up-to-date



never inflating sales or profit figures or moving them between accounting periods



demonstrating integrity and trust in submitting true and fair claims for business expenses and travel claims. When approving the claims of others, ask for receipts in accordance with the local travel and expense policy



being alert for, and immediately reporting, any actual or potential misrepresentation of records, data or accounts



creating accurate and reliable accounting judgements that are free from bias



speaking up immediately if you become aware of known or suspected fraud within the business

Safeguarding personal data

We deal with personal data on a regular basis, whether relating to our colleagues, job applicants, customers, suppliers or our business partners. It is our obligation to protect data by law and also contractually on behalf of our customers. We must always respect an individual's right to privacy and take care to deal with all personal data responsibly. Personal data is any information about individuals that might make it possible to identify them alone or in combination with other personal information. This includes names, addresses, telephone numbers and email addresses and other identifying information and can be stored electronically or in physical form.

At Belron we...

- take our responsibility very seriously to take care of the personal information we manage
- ensure that all local businesses have measures in place to ensure data protection
- comply with all relevant laws in each country. Although this will differ slightly, as a minimum we commit to ensure personal data:
 - Is used only for valid business purposes
 - Is controlled and processed in accordance with individuals' rights
 - Is held securely at all times
 - Is not transferred without adequate protection
 - Is stored and used in line with local legislation
- Is fairly and lawfully processed
- Is processed for limited purposes
- Is accurate, adequate, relevant and not excessive
- Is not kept for longer than necessary

All of us can make a difference by...



being responsible for taking good care of the personal information we manage for employees, job applicants, customers, suppliers and business partners



being informed about your local data protection guidelines and complying with the requirements



only collecting, processing, using and storing personal data required by law and for business purposes



ensuring data is kept securely and not shared beyond those who legitimately need to know it for stated business purposes



immediately reporting any data breaches to your local Legal or IT department



following local guidelines on the secure disposal of data

Preventing fraud and money laundering

Fraud is a serious matter. It means behaving dishonestly, in order to gain an advantage to which you are not entitled or to disadvantage someone else. Examples might include issuing false invoices for services that have not been provided, false expenses, forgery, the facilitation of tax evasion, or providing false or incomplete information to a customer or to the authorities. Fraud can also be taking the company's assets without permission. It can lead to legal proceedings against the company and individuals, as well as disciplinary action. Attempted fraud can also come from outside of Belron – for example being targeted by cyber-criminals. All of us need to be vigilant against these growing threats.

At Belron we...

- have introduced processes to reduce the potential for error and individual misconduct
- have developed checks that monitor our business processes to help prevent fraud
- only provide truthful information to our customers, partners and the authorities
- ensure everyone is aware of their responsibilities



What is Money laundering?

Money laundering is a type of fraud, and examples of suspicious behaviour include a customer who wants to pay in large amounts of cash. Or they might be using an account based in an unexpected location, such as an offshore account. Any suspicious activity should be reported to your manager.



Managers have additional responsibilities

If you are a manager, you are responsible for ensuring that your team is aware of relevant guidelines and attends any relevant training made available.

All of us can make a difference by...



complying with all local laws in the country or countries you work



never taking deliberate action, knowingly tolerate or omit to act in order to obtain an advantage to which we are not entitled



attending any relevant cyber security training offered, such as how to spot phishing activity



never letting anyone persuade you to give false information



ensuring you speak up immediately if you suspect fraud by anyone in relation to the business



Complying with Trade Sanctions

Belron must always be compliant with all relevant laws that govern trading with other parties, whether supplying or purchasing goods or services, paying or receiving funds, or entering into any licensing arrangements. In this context, there are sometimes specific legal requirements concerning export controls and economic sanctions that may be in place which are commonly referred to as Trade Compliance or Trade Sanctions requirements. Most countries, including all those where Belron Group operates, have Trade Compliance laws in place which apply to our operations.

Export controls apply, for example, to the exportation of goods which are or could be used for military purposes. Belron does not currently handle any controlled goods to which export control laws would apply.

Countries, regions (such as the EU) and international organisations (e.g. the UN) sometimes impose trade, financial or economic sanctions. Sanctions can be imposed on entire countries, named individuals or specific legal entities, appearing on 'sanctions lists' which are amended/updated from time to time. Belron does not knowingly deal with any parties, countries, individuals or entities that appear on any sanctions list.

At Belron we...

- want to ensure, where relevant for your role, the key requirements of Trade Compliance Laws are clear and the steps to be taken to ensure Belron complies with those laws
- undertake adequate due diligence to ensure that no business is conducted with sanctioned individuals or entities and that exports are controlled according to all applicable laws and regulations. This includes reviewing customers and suppliers as well as reviewing transactions and payments

All of us can make a difference by...



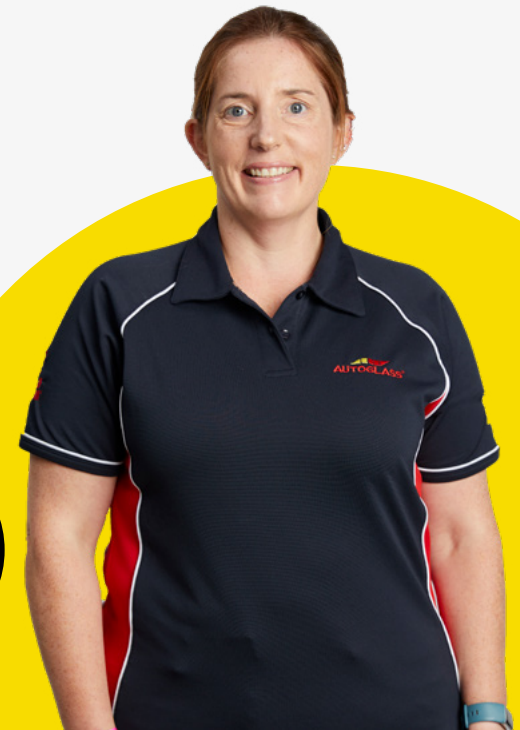
complying with
Belron's Global Trade
Compliance Policy



remaining vigilant
to ensure that we continue
to comply with
Trade Compliance laws



contacting your Legal Team
if you think a colleague or
Business Unit may be
acting in contravention of
Trade Compliance Laws

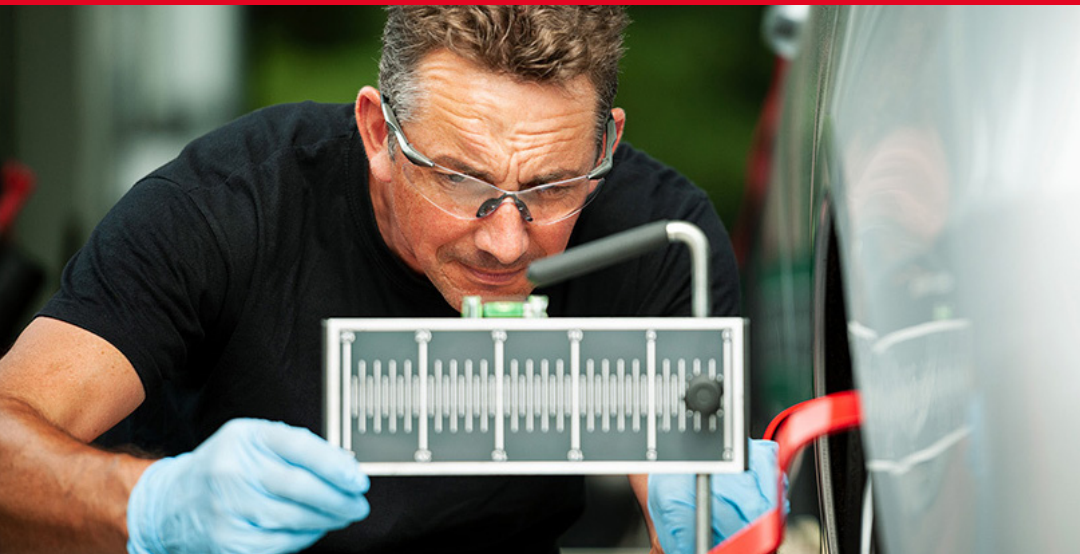


Protecting our reputation

We are proud of our reputation, which has been built on delivering world-class service over the years to our millions of customers in every country we operate. Our reputation continues to be fostered through every interaction we have externally; whether through our everyday work, dealing with the press, or on social media. We must all be mindful of our behaviour, how we communicate, and how these can both affect our reputation with others.

At Belron we...

- believe that we all represent our company and brand every time we put on a company uniform, answer a phone, speak to a customer, or complete a job
- ask all our employees to take pride in their standards of behaviour, and to act professionally and in line with our values at all times



All of us can make a difference by...

1

Reputation

remembering that everything you do in your work contributes to Belron's reputation. You are the company, you are Belron

2

Professionalism

showing the highest standards of professionalism, behaviour and courtesy – for example, driving considerately, not smoking outside any company buildings or at customer premises unless in a designated area

3

Social media

being mindful of what you post or how you comment on social media, to avoid the risk of damaging our reputation by association. If in doubt, check the social media guidelines in your country

4

Media requests

forwarding media requests for statements on behalf of Belron and our businesses to your Communications team, unless it is your role to deal with them directly

**Thank you for
making a difference**



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