

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 15 June 2026

Scope of statement

This statement is in accordance with the UK Modern Slavery Act 2015. It sets out the activities by Belron International Limited both in its own operations and with its suppliers, during the financial year ending 31 December 2025.

About Belron International

Belron International acts as the central support and procurement hub of operations on behalf of the Belron family of businesses. Belron International is home to around 350 employees, primarily office based, in roles including finance, legal, human resources, responsible business, IT, sales and marketing, supply chain and operations.

About Belron® and its operations

Belron is a global player in vehicle glass repair, replacement and recalibration (VGRRR), serving motorists with glass damage worldwide. Our purpose is to make a memorable difference with care to our shareholders, our customers, our people and society. This purpose is shared right across the business, and along with our values of being caring, driven, genuine and collaborative, is the driving force behind all decisions.

We operate in 42 countries across six continents through wholly owned businesses and franchises. Our market-leading brands include Autoglass® in the UK and Ireland, Carglass® in Europe, Lebeau® Vitres d'autos and Speedy® Glass in Canada, Safelite® in the US, O'Brien® in Australia and Smith&Smith® in New Zealand.

In addition, Belron manages vehicle glass and insurance claims for insurers, provides glazing services across Australia as O'Brien® Glass, offers plumbing and electrical services through Laser® and O'Brien® Plumbing & Electrical in Australia and New Zealand, and delivers window and door repairs in New Zealand under the Exceed® brand.

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 centre associates, and office-based employees supporting the businesses in procurement, marketing, sales, human resources, responsible business, finance, legal and IT. Each of the Belron country businesses is led and operated by a separate executive team who has direct engagement with the Global Leadership Team (GLTM) at Belron International.

Working at Belron International

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

Each year, Belron International colleagues take part in the Global Annual Engagement Survey. It is an anonymous survey that seeks feedback from all employees on how engaged they are, their experience of working at the business, and how the business demonstrates its values. In 2025, the survey had a response rate of 91% 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 follows a structured recruitment process, including appropriate checks on candidates’ identity, eligibility and right to work. We complete employment referencing for all candidates offered roles and take steps to ensure recruitment is conducted fairly, transparently and free from exploitation.

We are committed to preventing modern slavery risks within our recruitment activities. Candidates are not required to pay any recruitment fees at any stage of the hiring process, and we work with our agency partners to ensure fair and responsible recruitment practices.

All employees are provided with a clear contract of employment that complies with applicable local legislation and are supported to understand expected standards of behaviour through mandatory Code of Conduct training. We provide fair and equitable pay and benefits, promote a culture of wellbeing and inclusion, and ensure terms and conditions of employment align with local legal requirements.

Responsible Business Framework

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

The Framework is aligned with our purpose and values and has two strategic pillars: working towards sustainable products and services and investing in people and society. Our priorities under these pillars are:

- Reducing waste and building a circular economy
- Driving down emissions
- Sustainable procurement
- People safety and wellbeing
- Promoting diversity, equity and inclusion
- Giving back to our communities

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

The [Belron Responsible Business Report](#) for 2025 is available on our website.

Responsible Business governance

Chief People Officer Susan Ormiston, and Group Customer Director, Richard Tyler, sponsor the two pillars of our Responsible Business Framework. Progress is reviewed at least monthly by the GLTM and at least five times per year by the Belron Group SCA Board at their regular review meetings.

A central Responsible Business team coordinates and facilitates ESG (environmental, social and governance) activity by monitoring progress and performance and providing knowledge and expertise to support the delivery of the Framework in every country where we have a presence. Our in-country leadership teams are responsible for their own individual performance, 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 and teams support their responsible business agenda locally. In a number of markets, we have dedicated responsible business and sustainability specialists.

Our values & ethics

We uphold high ethical standards and expect the same from our partners. Our commitment to human rights is outlined in the Belron Code of Conduct and Supplier Code of Conduct and since 2010, we have adhered to the Ten Principles of Responsible Business under the United Nations Global Compact.

The [Belron Code of Conduct – Our Way of Working](#) (the “Code”) 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:	
• 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.	• 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 Code of Conduct was updated and relaunched supported by a global mandatory e-learning module covering all aspects of the Code. Both the Code and the e-learning are available in all relevant Belron languages and made widely available to all employees in the Belron family of businesses, via on-line platforms.

Every year, all employees, including those at Belron International are required to read the Code and certify that they understand their responsibilities. The Code sets out the minimum standards all employees must adhere to at Belron International as well as across the Belron business globally. It makes clear what employees should expect from working at Belron and, importantly, how they can speak up if things aren't right.

As reported in our previous statement, in 2023 Belron International launched an annual mandatory modern slavery e-learning module for its employees, developed with external providers that specialise in modern slavery and human trafficking awareness. The purpose of the training is to enable colleagues to recognise modern slavery and help mitigate the risk of incidents. All existing employees are required to complete an annual recertification, and all new starters are required to complete the training as part of their onboarding programme.

In early 2026, Belron developed and rolled out a stand-alone Anti-Modern Slavery Policy that applies to all employees and contractors, including those at Belron International, and to all franchises. The policy is intended to set the minimum standards across the business and has a purpose to:

- demonstrate Belron's dedication to ethical business practices and human rights;
- outline Belron's proactive approach to preventing modern slavery and human trafficking within its operations and supply chains; and
- ensure adherence to applicable laws and regulations.

Speaking up

Belron's Speak Up Policy, a new policy applying across the Belron family of businesses, sets the standard for how concerns are raised and handled, enabling employees to report any suspected unethical, illegal or improper conduct confidentially and anonymously through the Speak Up service.

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

Our Speak Up service, operated by leading provider NAVEX Global, is available for any employee and third parties working with us, such as business partners and suppliers, who want to raise an issue or concern. They can do so in confidence and anonymously by phone or online and in their local language.

The Speak Up service is highlighted in the Speak Up Policy, the Anti-Modern Slavery Policy and the Code of Conduct document and is incorporated in the mandatory training for all employees. As reported in our previous year's statement, we focused on streamlining our Speak Up service so that all employees can report concerns in a consistent manner and ensure that the necessary processes are in place in line with the EU Whistleblowing Directive.

No instances of modern slavery or human trafficking were reported to the Speak Up service in last 12 months (since our previous Modern Slavery Statement).

Our supply chain

The Group Procurement team at Belron International sources and manages the procurement of selected core products and services centrally and sets the standards for the way goods and services are procured across the Belron family of businesses.

The key categories of products and services that are procured by Belron are:

Direct materials	- The vehicle glass that we fit to customers' cars - The adhesives used to bond glass to vehicle bodies - Glass cleaning products - The tools and recalibration equipment used by our technicians - The components of our glass repair system - Products for resale such as wiper blades and rain repellent
Indirect goods and services	- The software solutions used by our businesses globally - Professional services such as consulting and legal services - Vehicles and the products and services needed to maintain our fleet - Management of our global network of property sites including offices, branches, and distribution centres (DCs) - The equipment used in our global DCs - Workwear and uniforms - Consumables such as PPE

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. We maintain a database of the location countries of all global suppliers, which is then used to set risk profiles for them accordingly.

Suppliers that are managed directly by the Group Procurement team at Belron International are classed as Tier 1 suppliers. These Tier 1 suppliers are primarily leading multinational companies with global footprints. Additionally, we have relationships with some smaller specialist suppliers. For the majority of these suppliers, we have long-term commercial partnerships.

Upstream suppliers of raw materials (and parts or components thereof) as well as other goods and services procured via an agent or other commercial partners, are classed as suppliers in Tier 2 or beyond.

Within our Tier 1 suppliers:

- 55% are located in countries considered to have low risk of modern slavery
- 25% are located in countries considered to have a medium risk of modern slavery
- 20% are suppliers of good or services considered to carry a high risk of modern slavery

When a supplier is located in an area with a higher risk of modern slavery, we increase the frequency of site audits, and within these, we also increase the number of assessment points that check for any instances of modern slavery

Our Sustainable Procurement programme

Belron International operates a Sustainable Procurement programme which aims to ensure that sustainability considerations, including human rights and modern slavery risks, are embedded into how we select and manage suppliers globally. The programme is based on the principles of human rights due diligence, aligned with internationally recognised frameworks including the United Nations Guiding Principles on Business and Human Rights. This approach involves identifying and assessing actual and potential adverse impacts within our supply chain, taking action to prevent or mitigate those impacts, tracking the effectiveness of our actions, and communicating our progress.

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's Sustainable Procurement programme develops and maintains the frameworks that govern the way we buy goods and services, including policies, processes and guidance documents. These ensure that the principles of Sustainable Procurement, of performing due diligence, and complying with any local modern slavery legislation are embedded into the way we buy globally.

Belron 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 Tier 1 suppliers. Compliance of suppliers with the expectations set out in the Supplier Code, and their performance against sustainability targets, are all critical requirements of doing ongoing business with us. Continued compliance is ensured through our assessment and due diligence programme.

In 2025 we continued to use our Supplier Code as the foundation for our engagement with suppliers.

Within the Code, there are three key sections:

1. **'Operating Responsibly'** focuses on protecting the environment and the health and safety of suppliers' employees and supporting local communities.

2. **'Respecting Human Rights'** is about protecting the rights and freedoms of both our suppliers' employees and those in their supply chains, setting out our expectations on pay and working hours, diversity, child labour, and modern slavery.
3. **'Acting with Integrity'** sets out our requirements on anti-corruption, protecting data and information, and the steps we expect our suppliers to take to ensure they can keep supplying Belron with the goods and services that we need.

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

To help our suppliers know how to meet the expectations set out in the Supplier Code, we have a Supplier Sustainability Handbook. This is practical 'how-to' guide which sets out the minimum requirement our suppliers must demonstrate and outlines how we will assess and audit their compliance with the Supplier Code.

Assessing risks and supplier due diligence

Supplier risk assessment is based on supply chain mapping across Tier 1, and for the most critical suppliers also across Tier 2 and beyond, enabling us to track value chains back to raw materials and identify risks at each stage. Risk profiles are updated at least annually using internal and external insights, and suppliers are then assessed ongoing against a range of factors including financial stability checks, sanctions screening, adverse media monitoring, and geographical risk analysis. These insights are captured in monitoring systems and dashboards, providing a consolidated view of supplier status and highlighting areas requiring attention. Identification of risks in our supply chain relating to modern slavery is a key area within our broader ESG risk management approach.

We maintain a comprehensive, risk-based approach to assessing and monitoring supplier compliance across our value chain. Our Sustainable Procurement team conducts an ongoing programme of remote assessments and on-site audits across production, distribution, and service delivery locations, supported by independent external partners using a bespoke methodology. This framework evaluates a broad range of ESG risks—including modern slavery, human rights, health and safety, and environmental impacts—and produces corrective action plans with defined resolution timelines where required.

Audit planning and frequency are prioritised based on supplier risk scores, and review periods are updated quarterly. Our audit programme includes direct, anonymised worker engagement conducted in local languages by independent experts, ensuring visibility of on-the-ground conditions. In 2025 we met our objective of having all our strategically important suppliers covered by a valid assessment or audit.

We apply a structured scoring mechanism to audit outcomes, which identifies risks, tracks performance, and highlights areas of good practice. Findings are followed up through continuous engagement with suppliers, including corrective actions, guidance, training, and workshops, particularly focused on modern slavery awareness and prevention. Suppliers are also required to demonstrate appropriate due diligence within their own supply chains.

This ongoing, collaborative approach, combining rigorous assessment, transparent dialogue, and capability building, enables us to effectively manage risk, drive continuous improvement, and support high levels of supplier compliance across our global operations.

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 and Group Legal 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.

Plans for the year ahead

Our key focus for 2026 is to embed risk assessments further back in the procurement process, allowing us to identify risks before decisions are made, and to include modern slavery risk as a criterion in these decisions for our most critical categories.

We also plan to continue delivering in-person modern slavery training to our colleagues whose roles are most critical to understanding and mitigating risk, which will supplement the mandatory online modern slavery training that all Belron International employees must complete annually.

Susan Ormiston, Chief People Officer

Belron International Limited Board

Date: 15 June 2026