

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 it’s 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 "Gary Lubner".

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.