

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

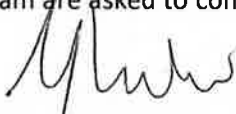
- On-site audits
- Online evidence based audits
- Self-assessment surveys
- In-house checks of selected criteria for all suppliers

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.