

# 2020

## STATEMENT



## **Belron International Limited**

### **Modern Slavery: Our approach to making a difference**

#### **Our structure and business**

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

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

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

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

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



## **Our approach**

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

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

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

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

## **Our due diligence process**

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

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

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



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

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

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

### **Training**

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

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

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

Gary Lubner, CEO

Date: 26 June 2020

Belron International Limited Board

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