



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 29 June 2022.

Our business structure

Belron® International Limited acts as the central support and procurement hub of all operations on behalf of the Belron family of businesses (referred to as 'Belron' throughout this statement). Belron is the worldwide leader in vehicle glass repair, replacement and recalibration (VGRRR) operating in 37 countries, through wholly owned businesses and franchises, with market leading brands – including Autoglass®, Carglass®, Lebeau Vitres d'autos®, Speedy Glass®, Safelite® Autoglass, O'Brien® and Smith&Smith®.

Aside from dealing directly with customers, Belron manages vehicle glass and other insurance claims on behalf of insurance companies. Each of the Belron family of businesses is led and operated by a separate executive team who has direct engagement with the global leadership team at Belron® International.

For clarity, the Belron family of businesses including Belron® UK have their own supply chains for products and services procured locally and are responsible for conducting their own due diligence and for complying with any local modern slavery legislation.

Our Responsible Business Framework

Belron's approach to responsible business is driven by its purpose of "making a difference with real care".

From a cultural perspective, Belron has a long tradition of serving society, and throughout our entire history we have encouraged our people to give back and we have supported hundreds of charities, NGOs and community groups, most recently establishing the Belron Ronnie Lubner Charitable Foundation. We were an early adopter of EcoVadis sustainability ratings and we have also been a signatory to the United Nations Global Compact since 2010.

Towards the end of 2020 we reviewed our corporate responsibility strategy and developed the Belron Responsible Business Framework (the 'Framework'). This brings together all aspects of how we view "Doing Business Responsibly", which is derived from Belron's purpose and values. We want to be "a trusted and respected company in the eyes of our people, customers, partners and society, by doing the right thing every day and behaving with integrity in everything we do".

The Framework has two strategic pillars – Sustainable Products & Services and Investing in People and Society. Our priorities under these pillars are to:



- Reduce our waste and work towards a circular economy
- Drive down emissions
- Integrate environmental and social considerations into all our procurement decisions
- Promote diversity, equity, inclusion and well-being
- Continue giving back to drive positive change
- Prioritise the safety of our people

In addition and underpinning the Framework, are core foundations including strong governance and inspiring leadership, a continued focus on our values and ethics, and a commitment to developing robust reporting and measurement around our responsible business activities.

The Framework was launched across the Belron family of businesses in 2021, and the company has made progress across all elements and has ambitious plans to do more in all areas.

THE BELRON® RESPONSIBLE BUSINESS FRAMEWORK



Our values & ethics

The [Belron Code of Ethics](#) (the 'Code'), which includes core guiding principles of integrity, respect and trust, details the company's set of values and ethics that provide clarity on what is acceptable behaviour across the organisation. The Code, which has been in place since 2010, remains an important part of Belron's way of working today. Each Belron business is responsible for the development of its localised code of ethics based on a centralised framework. Training and communications around ethical behaviour are also conducted at local level.



The business adheres to and promotes clear ethical standards for itself and expects similar standards from all third parties who work with Belron or on its behalf. Human rights are a fundamental pillar of Belron’s ethics and are addressed in the Code.

Our Code commits us to:	
<ul style="list-style-type: none"> • Always respect the human rights of everyone who works for us and on our behalf • Encourage partners, suppliers and others third parties to adopt similar standards of respect • Understand that we will not work with any organisation that fails to uphold basic human rights or one that might cause the company embarrassment by their links to inappropriate organisations or regimes 	<ul style="list-style-type: none"> • Report any concerns about human rights abuse immediately • Respect the rights of our colleagues to be involved in trade unions or collective bargaining arrangements • Avoid working with suppliers who fail to meet our standards and carry out checks to ensure compliance • Understand that in certain circumstances we may work with a supplier to improve standards first before terminating an agreement

Belron 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 its people or those in its supply chain be acceptable including any form of forced or bonded labour, child labour, physical punishment or any other abuse.

The Code which incorporates “Our Way of Working” is a public document available through the Belron website. Awareness of the Code is included in the induction process for all new people joining Belron® International.

In late 2021, we partnered with PwC to review and evaluate our current Code. From that review, we are currently in the process of updating the Code to reflect the latest in best practices, new regulations and updated government guidance. The updated Code will be supported by a global training programme (with annual refreshers and certification) for all Belron people, including Belron® International employees. Specialised training for specific roles that highlight key obligations, such as leaders, procurement managers and sales team will be part of the overall programme.

Belron maintains a Speak Up facility through NAVEX Global that provides a channel to raise concerns about behaviours or activities not aligned to the Code. Every issued raised through the Speak Up facility is investigated by the Belron® International legal team with support from the local businesses, and appropriate action taken where necessary. No instances of modern slavery were reported to the speak up facility in last 12-months (since our previous Modern Slavery statement).

The People team at Belron® International follow a rigorous recruitment process carrying out appropriate checks regarding each individual’s eligibility and right to work. We also complete employment referencing for all candidates who are offered roles. Employees are provided



with a clear contract of employment, which complies with applicable local legislation. We are committed to promoting a workforce free of discrimination and harassment and everyone must be treated in a fair and equal manner and with dignity and respect. We provide fair and equitable pay, benefits and additional conditions of employment in accordance with local laws.

Diversity, Equity and Inclusion ('DE&I') is a global priority for the business and is a key component of the Framework. Our ambition is to continue to have an organisation that protects its people and values difference in all its forms, creating an environment which enables everyone to participate and reach their full potential. We are committed to hiring and promoting people on the basis of their ability for a role and their appreciation of and respect and alignment with the company's culture.

We have developed a group wide philosophy, approach and goals to DE&I. An initial key step has been to understand the current position through surveys conducted as part of our employee listening and engagement. In the 2021 annual engagement survey key DE&I questions were asked of all employees globally providing feedback, insights and a solid baseline.

By 2025 our ambitions are to improve our gender mix across the business and improve the overall diversity of the Belron Leadership Group.

Robust reporting & measurement

The Belron businesses continue to use the EcoVadis sustainability ratings to measure performance in the areas of labour practices and human rights, environment, sustainable procurement and business ethics. Our business in Finland increased its EcoVadis rating from Silver to Gold; the businesses in France, Denmark, Sweden, Norway and New Zealand all retained their Gold rating; and the business in Belgium was the first Belron subsidiary to achieve the new Platinum rating.

Reporting requirements in the area of ESG continue to grow and develop. As well as fulfilling mandatory requirements, we are committed to developing our reporting to meet the needs of our different stakeholders and to ensure robust and transparent reporting of all our responsible business activities.

Today this includes the Non-Financial Reporting Disclosure within the D'Ieteren Group annual report; the publication of our UN Global Compact Communication on Progress; and the publication of Belron® International statement in response to the UK Modern Slavery Act 2015.



Our supply chain

Belron® International sources and manages the procurement of certain core products and services required by the Belron family of businesses globally. Centrally procured products and services include:

Products

- vehicle glass
- trims
- adhesives
- workshop equipment
- tools
- consumables
- products for resale

Services

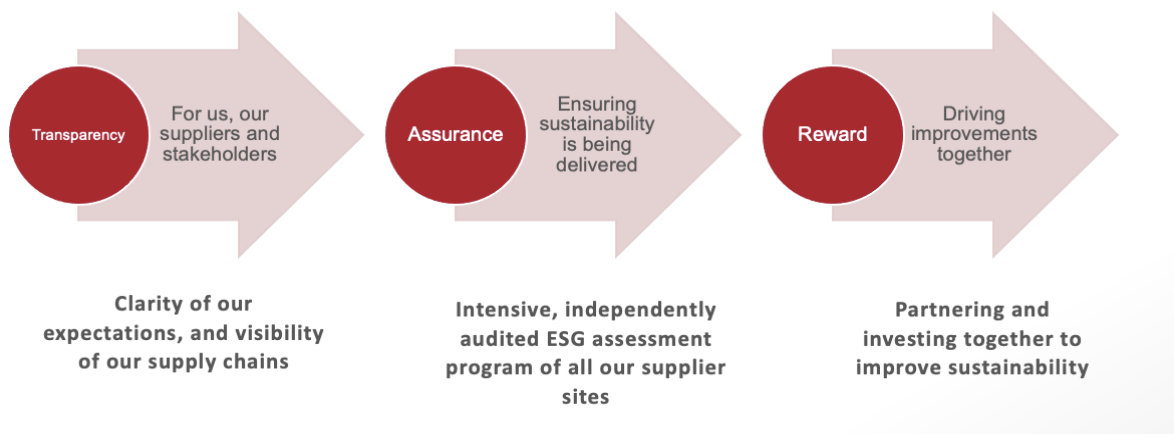
- software solutions
- IT maintenance
- professional services
- vehicle lease providers

Other products and services required by the Belron businesses locally are sourced and managed through their own local supplier network.

Suppliers that have a direct contractual relationship with Belron® International are classed as Tier 1 suppliers. Our Tier 1 supply base covers 131 production sites globally, which has increased from 120 in 2021. This tier 1 supply base consists of primarily, relationships with a small number of long-term commercial partners. In general, these are leading, multinational companies with global footprints, together with some smaller specialist suppliers. Upstream suppliers of raw materials (and parts or components thereof) as well as other goods and services procured without a direct relationship, for example, via an agent or other commercial partners, are classed as suppliers in Tier 2 or beyond.

Our Sustainable Procurement programme

Since 2020, Belron International has operated a formal Sustainable Procurement programme with the purpose of embedding sustainability at the forefront of all our supplier interactions including purchasing strategies and buying decisions. The programme is structured around three key pillars of transparency, assurance, and reward:





This programme is run by a specialist team, led by the Head of Sustainable Procurement with dedicated resource and a ring-fenced budget. The team has been further expanded in 2022 to facilitate a greater level of risk assessments and dialogue with suppliers.

Belron® International has a [Supplier Code of Conduct](#) (the 'Supplier Code') which applies to all suppliers of Belron® International and includes the high standards and expectations that they must all meet to both become and remain an approved supplier. The Supplier Code is available via the Belron website and has been communicated to all Belron® International 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.

The Supplier Code includes a specific section (3.4) on modern slavery, stating our position as follows:

We expect suppliers to comply with all applicable labour laws, and to respect and support the protection of human rights of workers as well as individuals and communities affected by their activities.

Suppliers must never use or support practices that inhibit the development of children and must not employ anyone under the age of 16 years or, where it is higher, the mandatory national school leaving age. Children and young persons under 18 shall not be employed at night or in hazardous conditions.

Suppliers must not use any form of involuntary labour including forced, prison or debt-bonded labour.

Suppliers must not require workers to surrender any government issued identification, passport or work permit, or other personal documents, as a 'deposit' or condition of employment.

Full compliance with any applicable Modern Slavery legislation or equivalent is essential, and suppliers must validate their employees' rights to live in the country in which they are based and provide a written contract of employment in a language understood by the employee.

Where the supplier provides living quarters to employees, such quarters must be fit for purpose and meet all legal regulations. Additionally, employees must have the right and ability to leave the quarters as and when they wish.

The Sustainable Procurement programme aims to drive and incentivise supplier sustainability performance. In 2021, we launched the Sustainable Supplier Awards, an annual programme with multiple categories that recognise the success of our suppliers and how they can contribute to Belron's responsible business agenda. The criteria for the awards include positive environmental and social impact, contribution to our responsible business goals, and assessment and audit results. The first award will be presented in 2022.



Our supplier due diligence

The Sustainable Procurement team maintains a complete and up to date map of the Belron® International Tier 1 supply chain, covering all production and distribution sites of centrally procured goods and services. We are currently mapping our Tier 2 supply chain with a specific focus on modern slavery risk areas and will soon expand this to include Tier 3 for high-risk suppliers and categories.

Identification of social and environmental risks in our supply chain including those around modern slavery, is one of the top priorities of the Sustainable Procurement programme. Using both internal expertise and external resource, this risk assessment is updated regularly and used to prioritise and schedule both remote and on-site audits.

As reported in the 2021 statement, in conjunction with two leading audit providers, TÜV and Elevate, we have developed a bespoke social and environmental on-site audit programme, aligned with our Supplier Code and incorporating modern slavery, health and safety, environment, labour and values. Our independent audit partners are responsible for undertaking site audits and assisting us in further developing our Sustainable Procurement programme. A key aspect of the on-site audit is direct dialogue with workers at the production sites which is done in local languages by the independent expert audit providers we use. Answers are anonymised and the results of the dialogue, as well as the on-site audit results are communicated to Belron® International. This is then followed up by the team to address any gaps and share opportunities for improvements.

The programme of site audits launched in Q3 2021 with a target of completing 30 to 40 on-site audits by the end of December 2021. We completed 31 audits and will continue to accelerate the programme through 2022 to meet our target of auditing all Belron® International Tier 1 supplier sites by Q3 2022 (as set out in our 2021 statement). As part of our programme, Tier 1 supplier sites will undergo annual re-assessment.

In our 2021 statement, we noted that our internal risk assessments identified that due to the production location (Malaysia), one of our purchased goods from a Tier 1 Supplier, namely nitrile gloves, had a potential risk of modern slavery. As indicated in our 2021 statement, we have since conducted a detailed on-site social and environmental audit and are satisfied that there are no instances of modern slavery present.

Any non-compliances found in supplier audits are addressed in a timely manner and with vigour. If any instances of modern slavery are found at site level these will be reported to the Belron International Board of Directors by the Head of Sustainable Procurement, with an appropriate action plan and timescales for improvements.

Following any non-compliance, the initial focus will be working with the supplier to resolve any issues, however we are committed to responsibly disengage with any suppliers who may demonstrate an unwillingness or inability to comply or to address any issues. We will report



on non-compliances as part of our annual Modern Slavery Statement. In this past reporting year, no instances of modern slavery were found.

Training and awareness

To support the Sustainable Procurement programme, we are committed to providing refresher training to all Belron® International employees and training to new employees as part of on-boarding. The purpose of the training is to enable colleagues to recognise modern slavery and help mitigate the risk of incidents. This training will be conducted in partnership with external providers that specialise in modern slavery and human trafficking awareness.

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

Gary Lubner, CEO
Date: 29-06-2022

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 2021 and was approved by the Board on 29 June 2022.