



# Belron® Supplier Code of Conduct

[www.belron.com](http://www.belron.com)





# Making a difference together

*Introduction from our CEO*

**At Belron, we have always taken our responsibility to the world around us very seriously.**

Doing business responsibly is embedded in our strategic priorities, and includes our commitment to the UN Global Compact, the United Nations Declaration of Human Rights, and our contribution to helping achieve the Sustainable Development Goals.

We have pledged to minimise our impact on the environment in our own operations, and have set clear targets to reduce waste, drive down emissions to zero and build a circular economy.

**But to make a real difference, we know we must look beyond just our own activities.**

We also want all the goods and services that help run our business to have a positive impact on social, environmental and economic wellbeing. We are committed to addressing the risks of exploitation, environmental damage and human rights abuses, throughout our supply chains.

We can only achieve these goals by partnering with like-minded suppliers who share our core values and are passionate about always striving to go the extra mile to improve.

Our Supplier Code of Conduct sets out what we expect from our suppliers. Just as importantly, it also sets how we want to work together – as a partnership, in a fair, collaborative and transparent way.

Together, we can continue to do business with real care, and make a real difference to the world around us.

Thank you for your support.

Carlos Brito  
CEO, Belron



# Contents



## **Purpose**

1

- 1.1 Scope
- 1.2 Transparency
- 1.3 Compliance



## **Operating Responsibly**

2

- 2.1 Health & Safety
- 2.2 Environment and Climate Change
- 2.3 Responsible Sourcing
- 2.4 Supporting Communities



## **Respecting Human Rights**

3

- 3.1 Forced Labour and Modern Slavery
- 3.2 Child Labour
- 3.3 Fair Pay and Working Hours
- 3.4 Collective Bargaining
- 3.5 Worker Protection
- 3.6 Diversity, Equity and Inclusion



## **Acting with Integrity**

4

- 4.1 Anti-Bribery and Corruption
- 4.2 Information Security
- 4.3 Business Continuity
- 4.4 Speaking Up





# 1. Purpose



## 1.1 Scope

The Code of Conduct (the Code) applies to all suppliers and subcontractors who are engaged to supply goods or services to Belron International Ltd and suppliers and subcontractors who are strategically important to the Belron Group, in all geographical locations.

It is our aim to bring all other suppliers and subcontractors into compliance with this Code of Conduct.

Suppliers must also comply with all applicable local laws and regulations. In the event that those impose stricter requirements than the Code, suppliers must comply with the stricter requirements.

**The Code references and should be read in conjunction with:**

- Belron Conflict Minerals Policy
- Belron Information Security Requirements

Suppliers are expected to cascade the principles of the Code to their own suppliers, in order to ensure alignment across the supply chain. This may involve the establishment of supply chain management processes that integrate the principles of the Code.

## 1.3 Compliance

Belron expects suppliers to maintain appropriate measures for on-going compliance, and to take appropriate action on discovery of any breaches in meeting the requirements of the Code. We are committed to working in partnership with our suppliers to support necessary improvements to their operations.

Compliance with the principles of the Code is a fundamental part of doing business with Belron. We may end relationships with suppliers in the case of severe breaches or continued failure to meet the principles of the Code.



## 1.2 Transparency

Belron reserves the right to audit suppliers against compliance with the Code. Suppliers are expected to ensure that documentation is kept that demonstrates compliance with all areas of the Code, and Belron or its nominated auditors may request access to that documentation at any time. Belron or its nominated auditors may also request access to any sites within the supply chain for audit purposes at any time.

## 2. Operating Responsibly

### 2.1 Health and Safety

Operating safely is a priority for Belron.

Our vision is to create a safe and healthy work environment with zero incidents, injuries, or incidents of work-related ill-health.

What this means for our suppliers:

Suppliers must comply with all applicable health and safety laws.

Suppliers must be committed to managing health and safety risks and to proactively protecting the health, safety and the welfare of their employees, contractors, and visitors.

Suppliers must have adequate documented policies and processes for identifying and managing risks, setting targets and monitoring performance.





## 2.2 Environment and Climate Change

Belron works to minimise the environmental impact of its operations and that of its supply chain, through continued GHG emissions reduction, diversion of waste from landfill and sustainable service delivery.

What this means for our suppliers:

Suppliers are required to comply with all relevant environmental laws and regulations.

Suppliers are expected to continually work to reduce the environmental impact of their operations, and that of their own supply chain.

Suppliers are expected to support Belron in achieving its own specific environmental targets.





## 2.3 Responsible Sourcing

Belron is committed to the responsible sourcing of materials across all its operations.

We are Partner Members of the Responsible Minerals Initiative, supporting responsible mineral production and sourcing.



### What this means for our suppliers:

Suppliers must carry out appropriate due diligence to ensure that products supplied to Belron are made only from materials that do not directly or indirectly support any group that commits human rights or environmental violations.

Suppliers are expected to listen carefully to requests or concerns from the community and address them appropriately.

Suppliers must provide Belron with supporting data on their raw materials supply chain when requested.

Where applicable, suppliers must comply with the Belron Conflict Minerals policy.

## 2.4 Supporting Communities

Belron seeks opportunities to support the communities in which we operate, through charities and organisations who help make a difference. We provide support through financial donations or active engagement through our people.

### What this means for our suppliers:

Suppliers are expected to engage with their local communities and to actively seek opportunities to contribute to community improvements and local charitable organisations.

# 3. Respecting Human Rights

## 3.1 Forced Labour and Modern Slavery

**We will not tolerate any form of forced or bonded labour** in any part of our operations or supply chain.

What this means for our suppliers:

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

Freedom of movement must not be restricted, including movement in canteens, during breaks, using toilets, accessing water or necessary medical attention. Workers must be allowed to leave the premises after shift end.

Employees should not have to pay fees in return for employment.

Full compliance with any applicable Modern Slavery legislation or equivalent is essential.

Suppliers should conduct appropriate due diligence to address the risk of forced labour and modern slavery in their own operations and supply chains.





## 3.2 Child Labour

**We will not tolerate child labour.**



What this means for our suppliers:

Suppliers must not employ anyone under the age of 16 years or, where it is higher, the mandatory national school leaving age.

If a child is found to be working directly or indirectly for the supplier, Belron must be informed within 24 hours. A remediation plan must be developed in consultation with the child's parents or guardians, and the child it concerns. The plan must prioritise the best interests of the child and enable the child to attend education until no longer a child. The employer must participate and contribute financially to the development and implementation of the remediation plan. The plan should include compensation for the child's family for lost income, as a minimum, at the local minimum wage. Belron reserves the right to involve local or international organisations to ensure proper remediation.



### 3.3 Fair Pay and Working Hours

We recognise the need to reward fairly for skill, contribution and performance.

#### What this means for our suppliers:

Suppliers must ensure that all wages meet local minimum wage requirements, that workers are paid in a timely manner and receive proper remuneration for all overtime hours worked.

In the case that no legal minimum wage exists, suppliers must ensure that employees receive a fair wage for work carried out which is enough to meet their core living needs and provide some discretionary income.

Suppliers must ensure that employees have reasonable work hours.

In the case that no legal limit is in place, the standard working week excluding overtime should not exceed 48 hs.

As a minimum, working time laws must be adhered to regarding working hours, overtime and rest breaks.

Total hours worked (including overtime) should not be detrimental to workers' health, safety, or well-being.



### 3.4 Collective Bargaining

We respect the right of all our people and those within our supply chain to join workers' organisations, and we encourage open and honest communications.

#### What this means for our suppliers:

Suppliers are expected to respect workers' choice of association to any workers' organisation, or similar, and also respect workers' rights to collective bargaining with their employer, without any discrimination.

Where the right to freedom of association and collective bargaining is restricted under law, the supplier should facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

### 3.5 Worker Protection

We act ethically and maintain a culture of respect and decency.  
**We will not tolerate any kind of discrimination, bullying or harassment.**

#### What this means for our suppliers:

Harassment, corporal punishment, violence, threats of violence, or coercion of employees, including all forms of physical, sexual, verbal or psychological abuse, and any harsh or inhumane treatment and any form of intimidation will not be tolerated.



### 3.6 Diversity, Equity and Inclusion

We maintain a culture of respect and equal opportunity in which individual success depends solely on personal ability and contribution. We believe in promoting an open and respectful atmosphere where all our people can thrive.



#### What this means for our suppliers:

Suppliers are expected to promote equal opportunities for all and to value diversity in society.

Suppliers must not engage in or support discrimination in recruitment, employee advancement and employment practices, including on grounds of gender, age, religion, ethnicity, race, cultural background, disability, physical features, marital relationship status, sexual orientation, gender identity and expression, pregnancy or potential pregnancy, family responsibilities, political beliefs, industrial activity, union membership, irrelevant criminal record, nor personal association with a person who possesses or is thought to possess any of these attributes.

Suppliers are expected to source from a diverse range of suppliers, and not to discriminate against suppliers on any unfair grounds.



# 4. Acting with Integrity



## 4.1 Anti-Bribery and Corruption

**We do not tolerate any forms or attempts of corruption or bribery** either towards or by our people or partners regardless of local customs and business practices. We will never offer, give or accept anything of value that is, or could be seen as, improperly influencing business decisions.

What this means for our suppliers:

Suppliers must conduct their business honestly, fairly and free from any bribery or corruption.

Full compliance with any applicable anti bribery and corruption legislation is essential.





## 4.2 Information Security

Our technologies, intellectual property and commercially sensitive and confidential information are vital assets of our business and we protect them from unauthorised access, use and disclosure.

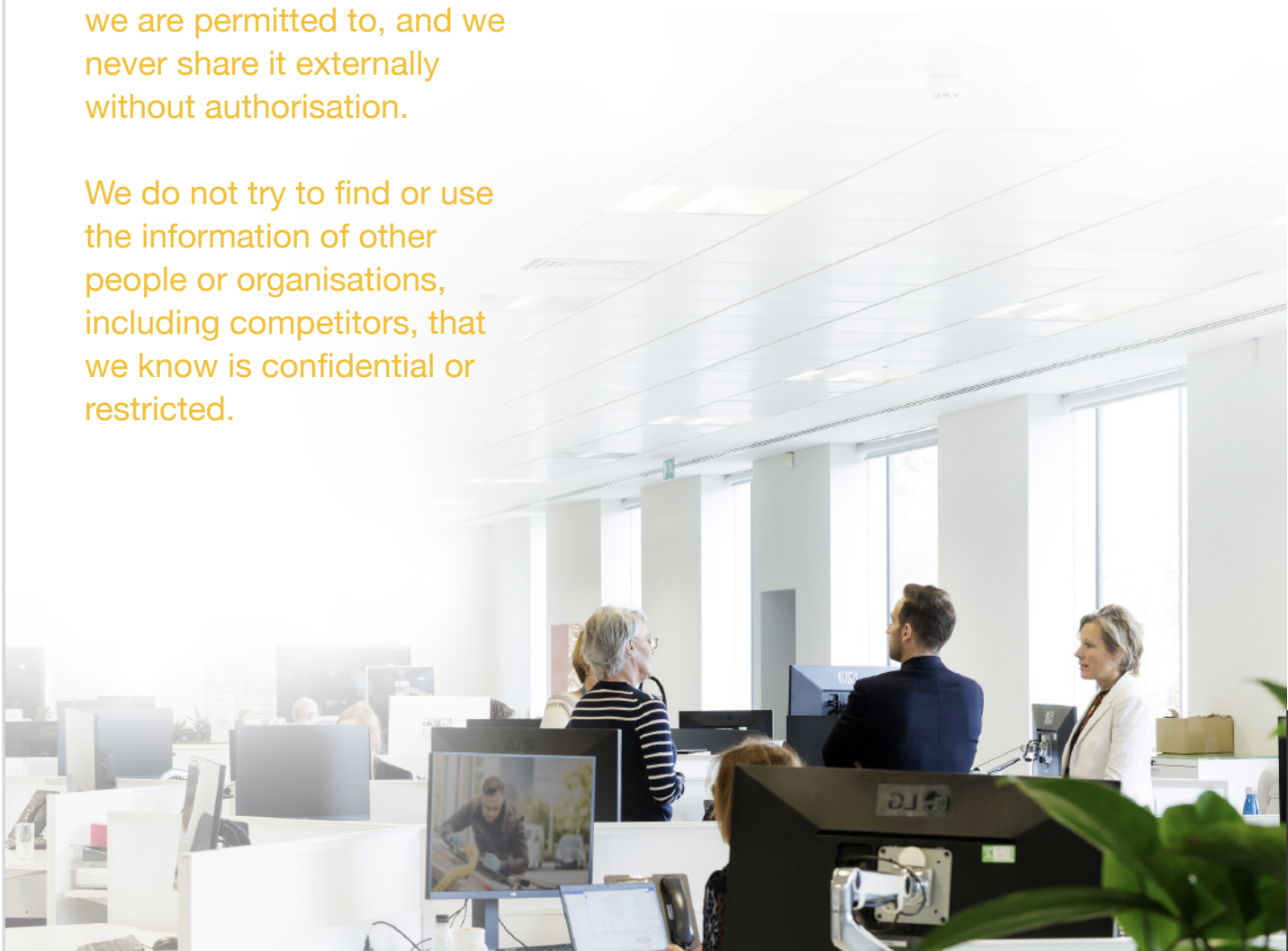
We protect the confidential information we hold, including data from employees, customers, suppliers, joint ventures and other parties. We only share and use this information internally to the extent that we are permitted to, and we never share it externally without authorisation.

We do not try to find or use the information of other people or organisations, including competitors, that we know is confidential or restricted.

### What this means for our suppliers:

Suppliers are expected to safeguard our resources and information and ensure that all data and documents are kept secure.

Suppliers must comply with Belron's Information Security Requirements.





## 4.3 Business Continuity

Keeping our business moving is important for all our stakeholders. We assess potential risks to this and make appropriate plans to mitigate against them.

What this means for our suppliers:

Suppliers must undertake their own business continuity analysis of their own business and their suppliers, and mitigate against any risks that they find.

## 4.4 Speaking up

We all have a duty to speak up when problems arise, when we see things that don't look right, or if we are ever unsure of which course of action to take. Speaking up allows us to take action and put things right. Belron has a responsibility for ensuring that anyone who does raise concerns is free from retaliation or reprisals.

What this means for our suppliers:

Suppliers must make available to their employees a means for them to speak up or raise any concerns confidentially, ensuring that those who raise concerns are free from retaliation or reprisals.

Suppliers can also raise questions or concerns to Belron, anonymously if required. Concerns may be raised via email **tell.us@belron.com** or by telephone on **+44 (0)1784 676 430**. Suppliers are expected to share these communication channels to Belron with their employees.

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