



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 3 June 2024

About Belron®

Belron is the leading vehicle glass repair, replacement and recalibration (VGRRR) business in the world, with a presence in 40 countries, through wholly owned businesses and franchises. Our market leading brands include Carglass® across Europe, Safelite® in the US, Autoglass® and Laddaw® in the UK, Lebeau Vitres d'autos®, Speedy Glass®, Apple Auto Glass®, Duro® vitres d'autos and Vanfax® in Canada, O'Brien® in Australia and Smith&Smith® in New Zealand. Aside from dealing directly with customers, Belron manages vehicle glass and other insurance claims on behalf of insurance companies.

Our operations

Belron employs around 30,000 people globally across its wholly owned businesses in roles including mobile and branch-based technicians, call centre agents, warehouse and distribution centres' associates, and office-based colleagues supporting the businesses in procurement, marketing, sales, human resources, finance, legal and IT. Each of the Belron country businesses is led and operated by a separate executive team who has direct engagement with the global leadership team at Belron® International.

Belron International

Belron International is home to around 300 employees, primarily office based, in roles including finance, legal, human resources, IT, sales and marketing, supply chain and operations. Belron International acts as the central support and procurement hub of operations on behalf of the Belron family of businesses.

Working at Belron International

Our employees are at the heart of our business and their wellbeing, engagement and experience are key priorities. We are committed to promoting a workforce free of discrimination and harassment and aim to treat everyone in a fair and equal manner and with dignity and respect.

Each year, Belron International employees take part in the Global Engagement Survey. It is an anonymous survey that seeks feedback from all employees on how engaged they are, what

their experience of working at the business is like, how the business demonstrates its values, and some key DE&I (Diversity, Equity and Inclusion) drivers. In 2023, the Annual Engagement Survey had a response rate of 89% at Belron International and an engagement score of 91%. Engagement is defined as “Being Proud and Committed” and is an average of the Total Favourable score of 3 questions asking whether employees are proud to work for our business, whether they are inspired to work beyond what is required to help us succeed and whether their work gives them a sense of personal accomplishment.

Recruitment at Belron International

Belron International colleagues follow a structured multi-stage recruitment process encompassing appropriate checks regarding their eligibility and right to work. We complete employment referencing for all candidates who are offered roles within Belron International. We are on a journey of continuous improvement in how we attract, source, and retain the best talent from diverse groups of people.

All employees are provided with a clear contract of employment, which complies with applicable local country legislation, and are supported to understand the requirements of their conduct through mandatory Code of Conduct training. We provide fair and equitable pay, employee benefits, a culture of wellbeing and diversity, equity and inclusion, and additional conditions of employment in accordance with local country laws.

Our Responsible Business Framework

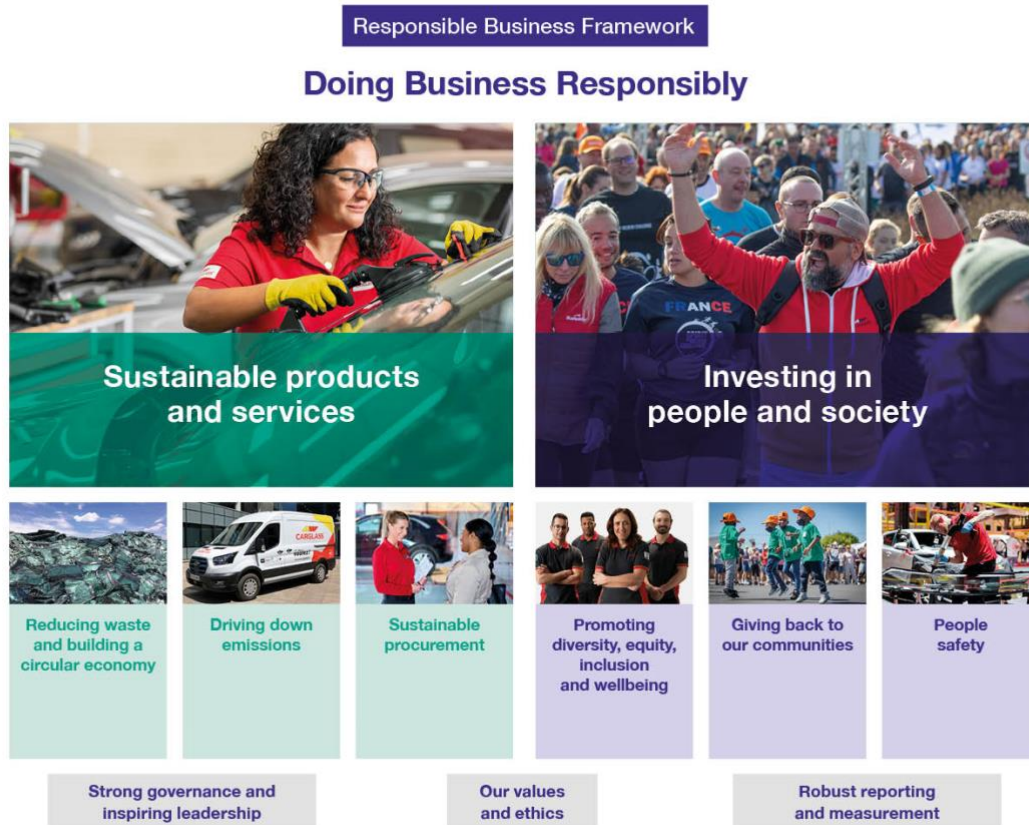
Our approach to responsible business is driven by our purpose of “making a difference with real care”.

The Belron Responsible Business Framework (the ‘Framework’) applies to all the Belron family of businesses including Belron International. It brings together all aspects of how we view “Doing Business Responsibly”, which is derived from our 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 to 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.



Responsible Business governance

Chief People Officer Susan Ormiston is the Executive Team member responsible for ESG (environmental, social and governance). Susan, and Group Customer Director Richard Tyler, sponsor the two pillars of the Belron Responsible Business Framework. Our Responsible Business progress is reviewed at least monthly by the Executive Team and at least five times per year by the Belron Board at their regular meetings.

Reporting into the Executive Team is a central Responsible Business team at Belron International which is responsible for: coordinating and facilitating company-wide activity monitoring progress and performance and providing knowledge and expertise to support the implementation of the Responsible Business Framework by each country business.

The country leadership teams are responsible for their individual responsible business performances and how this contributes to the overall objectives of the Framework. A network of Responsible Business Ambassadors, environmental reporters and in-country subject matter experts support the responsible business agenda locally. In countries including France, Germany, Spain, Canada, Australia, New Zealand and the UK, there are dedicated CSR / sustainability individuals or teams in place.

Our values & ethics

Our Code of Conduct – Our Way of Working sets out the behaviours expected by all employees regardless of role or location. It also promotes organisational values and ethical expectations across the business and demonstrates how to do business in the right way.

The Code supports and guides our people in their day-to-day decisions and makes clear what they can expect from working with us, and what to do if things aren't right. It sets out the minimum standards that must be adhered to globally; it does not replace local country policies but sits alongside existing policies and guidelines.

Our business adheres to and promotes clear ethical standards and expects similar standards from all third parties who work with us or on our behalf. Human rights are a fundamental pillar of our business ethics and are addressed in the Code, as well as how we build and maintain relationships with our suppliers and partners.

Our Code commits us to:	
<ul style="list-style-type: none"> • hold ourselves, our suppliers and our partners accountable for respecting the human rights of everyone connected to our business. • give clear guidance on our expectations towards our suppliers and in our Supplier Code of Conduct. • believe that all employment should be freely chosen, and we will only employ someone working of their own free will. 	<ul style="list-style-type: none"> • not tolerate any form of human trafficking such as forced or bonded labour in any part of our operations or supply chain. • not accept child labour or any practice that inhibits the development of children. • respect and support responsible human rights laws as set out in the UN Universal Declaration of Human Rights and the UN Global Compact.



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

Training and awareness

In 2023 the updated [Code of Conduct](#) (the “Code”) was launched supported by a global mandatory e-learning module covering all aspects of the Code. Both the Code and the e-learning were translated into all relevant Belron languages and made widely available to all employees, via on-line platforms.

All employees are expected to take the training and certify they have read, understood, and will comply with the Code. During 2023, 100% of our employees, including those at Belron International, completed the training. The Code will be reviewed and, if necessary, updated each year, supported by e-learning for re-certification. Training on the Code is also included in the induction process for all new people joining Belron International and is available via our intranet and publicly via the Belron website.

In addition to the training on the Code, Belron International launched a mandatory modern slavery e-learning module for its employees, developed with external providers that specialise in modern slavery and human trafficking awareness. The purpose of the training is to enable colleagues to recognise modern slavery and help mitigate the risk of incidents. Since its launch, 92% of employees have completed the training.

Speaking up

Our Speak Up service, operated by leading provider NAVEX Global, is available for any employee who wants to raise an issue or concern. They can do so in confidence and anonymously by phone or online and in their local language.

We believe that we all have a responsibility to speak up and raise concerns about possible breaches of the law, Group and local policies or our Code of Conduct. If employees see things that don’t look right, or if they are ever unsure of which course of action to take, speaking up allows us to collectively take action and put things right. We want to encourage everyone to speak up and to make it as easy as possible for them to do so.

The Speak Up service was highlighted in the updated Code of Conduct launch and incorporated in the mandatory training for all employees. Going forward, we are streamlining our Speak Up service so that all employees can report concerns in a consistent manner and ensure that the necessary processes are in place in line with the EU Whistleblowing Directive. In 2024, the Speak Up service will also become available to third parties working with us, such as business partners and suppliers. No instances of modern slavery or human trafficking were reported to the speak up facility in last 12-months (since our previous Modern Slavery statement).

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:

- The vehicle glass that we fit into our customers cars
- The adhesives used to bond glass to vehicle bodies
- The tools and recalibration equipment used by our technicians
- Consumables such as PPE and glass cleaning products
- Products for resale such as wiper blades and rain repellent

Services:

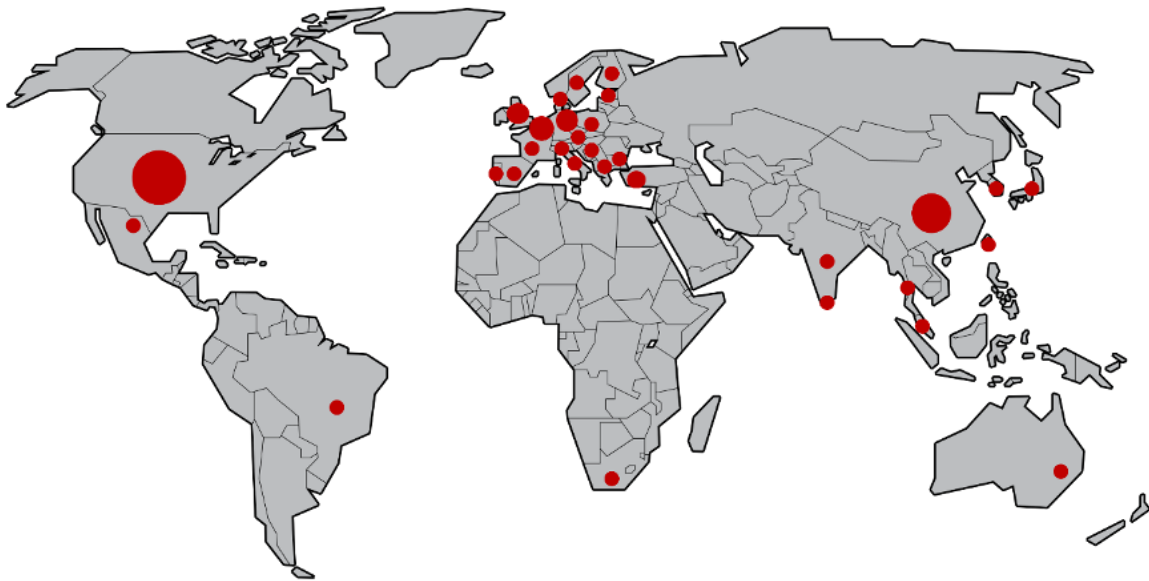
- Software solutions used by our businesses globally
- Professional services such as consulting and legal services
- Providers of vehicles through lease solutions

Our centrally managed suppliers are located in several countries around the world (*see map*) and are carefully selected to deliver value in sustainability, cost, quality and availability.

Our largest and most critical spend category is vehicle glass, which is primarily manufactured in the US, China, Poland, Czechia, South Africa, Turkey and Mexico.

After vehicle glass, our other most critical spend categories are:

- Adhesives: manufactured in the US and Germany
- Wiper blades: manufactured in Serbia, Belgium, China and Mexico
- Workshop equipment: manufactured in Germany, the US and China



Other products and services required by the Belron businesses locally around the world are sourced and managed through their own local supplier network. The local country businesses are responsible for conducting their own due diligence and for complying with any local modern slavery legislation including the publication of modern slavery statements where required.

Suppliers that have a direct relationship with Belron International are classed as Tier 1 suppliers. Our Tier 1 supply base now incorporates 145 production sites globally, which has increased by five sites in the past reporting year. Our Tier 1 suppliers are primarily leading, multinational companies with global footprints, with whom we have long-term commercial partnerships. Additionally, we have relationships 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.

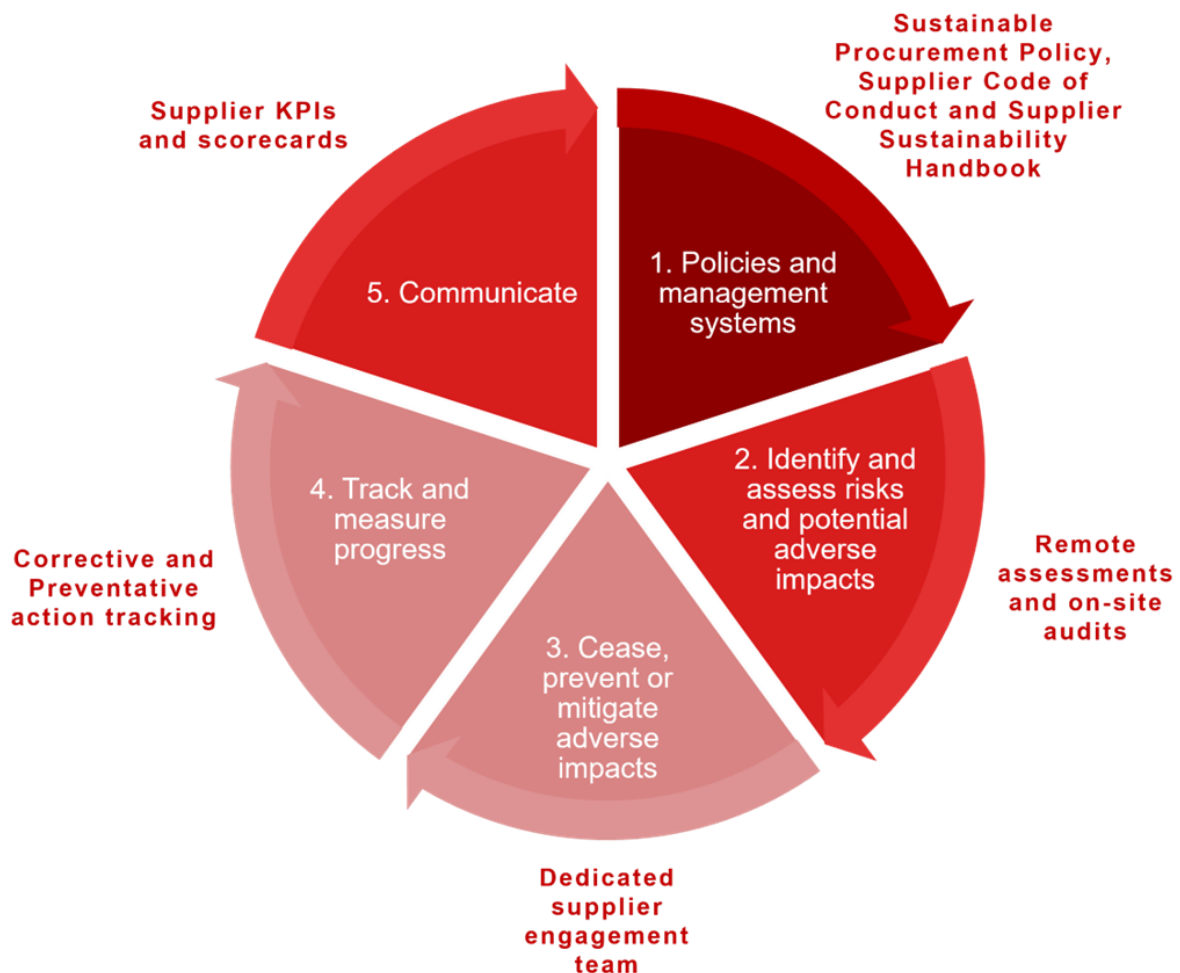
Within our Tier 1 suppliers:

- 57% are located in countries considered to have low risk of modern slavery
- 25% are located in countries considered to have a medium risk of modern slavery
- 18% are suppliers of good or services considered to carry a high risk of modern slavery

When a supplier is located in an area with a higher risk of modern slavery, we increase the frequency of site audits, and within these, we also increase the number of assessment points that check for any instances of modern slavery

Our Sustainable Procurement programme

Belron International operates a formal Sustainable Procurement programme with the purpose of embedding sustainability at the forefront of all our purchasing strategies, buying decisions, and supplier interactions. It is built around a 5-stage due diligence process:



This programme is run by a specialist team, led by the Head of Sustainable Procurement with dedicated resource focused on assessing supply risk and managing an ongoing dialogue with suppliers.

Belron International has a [Supplier Code of Conduct](#) (the 'Supplier Code') which applies to all our suppliers. This Supplier Code sets out the high standards and expectations that suppliers are expected to meet, in order to 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. Continued compliance is ensured through our assessment and due diligence programme.

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.

Through 2023 we developed an updated Supplier Code of Conduct, with a greater level of expectations placed on our suppliers, together with a new Supplier Sustainability Handbook (see below) that gives our suppliers practical guidance on how to meet those expectations. These documents will both be launched during 2024 and rolled out across our supply partners through a series of launch events and other communications. These documents will include details of the mechanism our suppliers or any third parties can use to 'speak up' if they need to raise a concern.



Assessing risks in the value chain

We continued the programme of assessing the supply chains of our key strategic suppliers in 2023, tracking value chains back to raw materials and assessing a broad range of risks and ESG impacts at each stage. The programme expanded through the year with the development of a business continuity framework to assess the capability of suppliers to continue providing goods and services to us in case of adverse events, and to provide contingencies if needed. The programme focused on the suppliers that are most critical to our business, including suppliers of glass, adhesives, and workshop equipment. This work included investigating the risks present across the value chain, understanding the measures in place to minimise and mitigate these risks, and creating of action plans to close any gaps. We are now working with suppliers on implementing these plans.

We use a range of systems to assess risks present in our supply chain, in order to provide real time status as well as alerts of any situations or events that need attention. These systems include platforms that monitor suppliers and their financial positions, validate that they are not sanctioned, and track any adverse media or reports that require further investigation. Risks associated with the geographical locations of suppliers are also taken into account. Additionally, online assessment platforms are used to capture information and data from suppliers on their ESG performance.

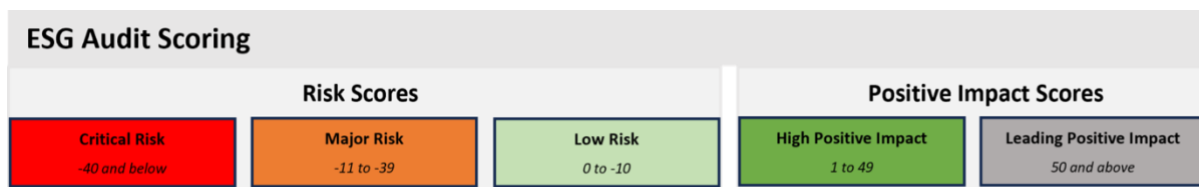
Assessment of suppliers & supplier due diligence

The Sustainable Procurement team maintains a complete and up-to-date view of the Belron International Tier 1 supply chain, covering all production and distribution sites of centrally procured goods and services, and the shipping routes they take to reach our sites. In addition, we have mapped our Tier 2 and Tier 3 supply chain for our most critical suppliers.

Identification of social and environmental risks in our supply chain, including risks relating to 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 at least once a year and used to prioritise and schedule both remote and on-site audits.

In conjunction with two leading audit providers, TÜV and Elevate, we run a bespoke social and environmental on-site supplier audit programme, aligned with our Supplier Code and incorporating modern slavery, health and safety, environment, human rights, and values. 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. Answers are anonymised and the results of the dialogue, as part of the overall on-site audit results are communicated to us. This is then followed up by the Sustainable Procurement team to address any gaps and share opportunities for improvements.

The supplier site audit programme was further enhanced in 2023 with the launch of a new scoring mechanism. In addition to identifying risks, the new scoring mechanism highlights areas of positive impact for which the suppliers are recognised, and which are used to support other suppliers to develop and improve their own positive impact.



In 2023 we completed 39 supplier site audits, against a target of 38. The targeted number of site audits is set annually considering the review period set for each site, which is done based on risk, criticality, and prior assessment results. This ensures that all supplier sites in the programme scope are re-audited within their set review period.

Non-compliance

As outlined in our previous statements, any non-compliances found in supplier audits are addressed in a timely manner and with vigour. If any instances of modern slavery or any other significant non-compliances are found at site level these are reported to the Belron International Board of Directors by the Head of Sustainable Procurement. The initial focus is to work with the supplier to resolve issues with an appropriate action plan and timescales for improvement. If the supplier is unwilling or unable to address and rectify the issue, we have a Responsible Disengagement policy in place to cease relationships with the supplier.

In this past reporting year, no instances of modern slavery were found, however one audit found an excessive use of overtime. We are working with the supplier to address and rectify this as effectively and expediently as possible.

Plans for the year ahead

As well as the launch of our updated Supplier Code of Conduct and the Supplier Handbook, our focus for 2024 includes a broader assessment of supply chain risk, with a deeper focus on the risks present in transport routes as well as production locations. Additional focus is also being placed on holding deeper dialogue with suppliers who may struggle to attain top assessment and audit scores, to support them to improve faster. We will also continue to monitor suppliers whose country of operations brings potentially high risk of modern slavery issues and use this to focus our assessments and audits accordingly.

Susan Ormiston

Susan Ormiston, Chief People Officer

Belron® International Limited Board

Date: 3 June 2024

This statement has been published in accordance with the UK Modern Slavery Act 2015. It sets out the steps taken by Belron® International Limited during the financial year ending 31 December 2023 and was approved by the Board on 3 June 2024.