



Belron[®] Supplier Code of Conduct

www.belron.com

Belron is the worldwide leader in vehicle glass repair and replacement with unrivalled brands - including Carglass®, Autoglass®, and Safelite® Autoglass, operating in over 35 countries through a network of wholly owned businesses and franchises. Belron exists to “make a difference with real care”; a clear purpose that is shared by every business wherever we operate.

This purpose focuses on delivering value to all four key stakeholder groups:

- our people
- our customers
- our shareholders
- society

We are a signatory to the United Nations Global Compact which means that we support 10 principles of responsible business within four important areas: human rights, labour, the environment and anti-corruption. For further information on the UNGC go to www.unglobalcompact.org

We are committed to maintaining the highest ethical standards, and conducting business in a safe, sustainable, responsible manner in compliance with all applicable laws, regulations and internationally recognised standards. As such, we will not tolerate improper business conduct of any kind and have a zero-tolerance approach that applies to our people, and to our suppliers and supply chains.

At Belron we will operate safely, act with integrity and be trusted to deliver excellence. We need the support of our partners, our suppliers and that of our broader supply chain, to ensure that together we are able to live up to these promises and continue to be successful together.

Belron Supply Management requires its suppliers to contribute to the delivery of:

- Quality _____ the highest level of quality standards
- Availability _____ timely and specific availability of goods and services
- Cost _____ optimisation of total costs
- Sustainability _____ innovative creation of value for people, society and the environment

Contents:

This Belron Supplier Code of Conduct (the Code) sets out the minimum level of behaviours, practices and standards that need to be demonstrated and complied with by our suppliers and in turn, their suppliers and further supply chains. This is a fundamental requirement of conducting business with Belron.

At Belron we go above and beyond minimum standards, and our suppliers are expected to do the same. Therefore in addition to complying with the Code as a minimum, suppliers are encouraged to develop and implement ways in which they can operate above and beyond the scope of the Code.

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1 Introduction

We set high standards for the way we do business, and the Code sets out the minimum standards we require from our suppliers. We expect all of our suppliers to adhere to the Code and ensure that their suppliers and supply chains also adhere to at least these standards. Suppliers must also abide by all local laws and regulations, and in the event that those impose stricter requirements than the Code, suppliers must comply with those requirements.

We choose our suppliers based on clear and fair processes without bias or favouritism. We will select suppliers who not only meet our business and commercial requirements but also on adherence to the Code and demonstration of socially, ethically and environmentally responsible standards of working.

1.1 Purpose

The purpose of our Supplier Management process is to ensure that all our suppliers and their global supply chains comply with the standards that we require. The purpose of the Code is to clearly communicate what these requirements are, and we undertake audits and assessments to ensure that these requirements are being complied with.

All our suppliers are required to adhere to and comply with, the principles set out in the Code, at all times.

The Code is freely available to view and download from www.belron.com.

1.2 Content, scope and applicability

The Code applies to all suppliers and subcontractors who are engaged to supply goods or services to Belron, in all geographical locations.

Suppliers are expected to cascade these principles 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 requirements of the Code.

We are committed to working in partnership with our suppliers to support necessary improvements to their operations. We may end relationships with partners who continually fail to meet, as a minimum, our standards of ethics, quality and business practices.

2 Operating safely

All suppliers are expected to make proper provision for the health, safety and welfare of their employees, contractors, visitors and those in the community who may be affected by their operations. We expect suppliers to comply with legal and industry requirements and seek to implement best practice in their industries.



2.1 Health and safety

Our principles:

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 are expected to be committed to managing health and safety risks and to proactively protecting the health, safety and the welfare of their employees, contractors, visitors and those in the community who may be affected by their activities.
- Suppliers must comply with all applicable health and safety laws and have adequate documented policies and processes for identifying and managing risks.
- Supplier sites must have adequate emergency equipment in place. This must be routinely audited and tested to ensure it is fit for purpose, functions correctly and is clear and available to use at all times.
- Supplier sites must have clear and known evacuation procedures with nominated assembly points. These must comply with local laws and authority regulations, and are available to use at all times.
- All workers must be aware of policies and receive training in incident management.
- Where risk analysis identifies the requirement for Personal Protective Equipment (PPE), then it shall be provided to employees free of charge.
- All employees must receive appropriate training on a regular basis on their roles (including manual handling, equipment usage, etc.) and emergency procedures and equipment use. This training should be monitored, recorded and repeated for new or reassigned workers.

2.2 Environmental considerations

Our principles:

Belron is responsible for developing and innovating ways of minimising its impact on the natural environment, taking steps to identify, prioritise and manage our environmental risks.

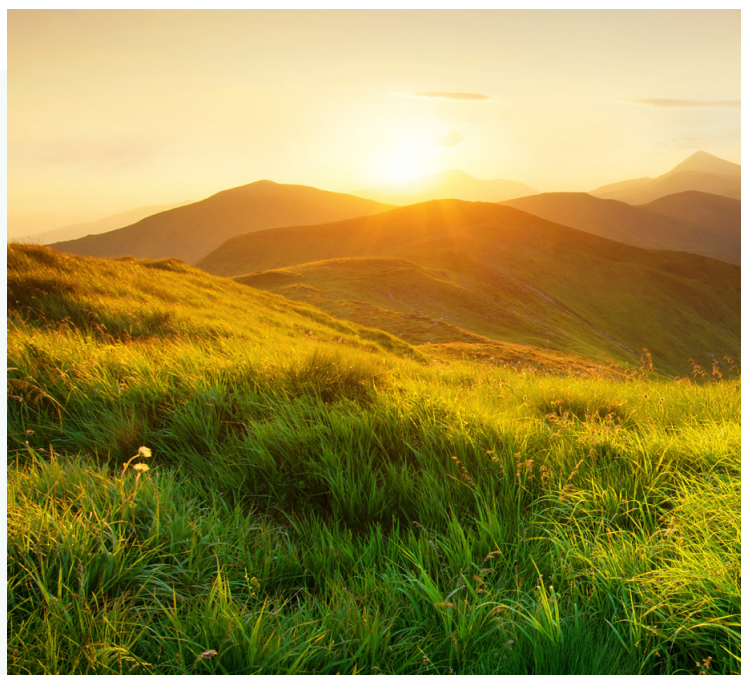
Belron works to minimise the negative impact of its operations and that of its supply chain, through a continuous reduction of emissions, maximising recycling and promotion of sustainable services.

Belron aims to have no environmental incidents, and to prevent or minimise the negative impacts of all its products and services.

Belron has specific environmental targets across its operations which will be communicated to suppliers from time to time. Suppliers are expected to support Belron in achieving these targets.

What this means for our suppliers:

- Suppliers must adopt systems, procedures and practices to minimise any negative impacts on the environment.
- Suppliers are required to comply with all relevant laws and regulations on environmental issues.
- Suppliers are expected to minimise negative environmental impact through minimising energy consumption, pollution and waste, and ensuring that all packaging is sustainably sourced, made from recycled materials, and is recyclable wherever possible.
- Suppliers are expected to continually work to reduce the environmental impact of their products.



2.3 Responsible sourcing

Our principles:

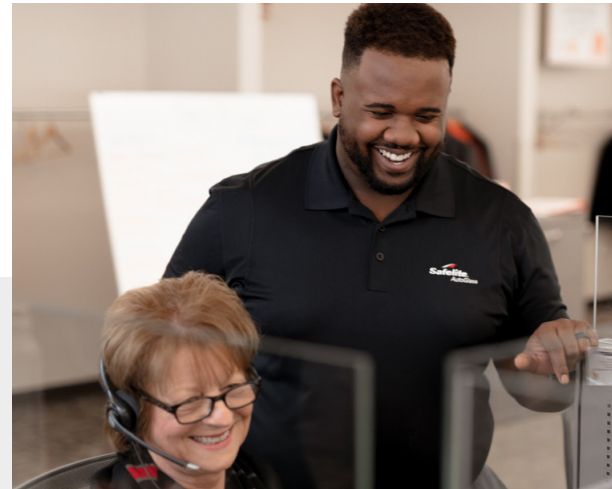
Belron is committed to the responsible sourcing of materials across all its operations.

What this means for our suppliers:

- Suppliers are expected to provide Belron with products made only from materials that are sourced responsibly.
- Any constituent minerals used must be verified as 'conflict free' in accordance with the OECD guidelines.
- Suppliers must provide Belron with supporting data on their raw materials supply chain when requested. In the event that the material 'chain of custody' supplied is 'indeterminable' or otherwise unknown, the supplier must commit to either attaining the appropriate certifications, or to phase out that material within an agreed timeframe.
- Suppliers must ensure that all purchased raw materials, products and services do not directly or indirectly support any group that commits human rights, environmental, or ethical rights violations.

3 Trusted to deliver excellence

We treat all our customers, suppliers and partners with fairness and honesty, and we expect suppliers to demonstrate these same behaviours. We will only engage with suppliers and partners whose values and behaviours meet high ethical standards.



3.1 Working with customers, suppliers, partners and communities

Our principles:

We compete fairly and with integrity. When seeking new suppliers and partners we conduct thorough due diligence. In addition to considering the financial and operational elements of supplier proposals, we also take steps to only choose suppliers and partners whose values and business behaviour meet high ethical standards. We seek 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 to our suppliers:

- Suppliers are expected to only engage with employees, agents, intermediaries, consultants, representatives, distributors, teaming partners, contractors, suppliers, consortia and joint venture partners who meet our and their standards with regard to reputation and conduct.
- Suppliers are expected to listen carefully to requests or concerns from the community and address them appropriately.
- Suppliers are expected to engage with their local communities and to actively seek opportunities to contribute to community improvements and local charitable organisations.

3.2 Conflicts of interest

Our principles:

We avoid any situation where conflicts of interest might be seen as influencing our business decisions or behaviour, or might stop us from acting in the best interests of Belron. If we believe there is, or might be, a conflict of interest, we speak up.

What this means for our suppliers:

Suppliers must conduct their business free from conflicts of interest or mitigate appropriately any such conflicts if they arise.

3.3 Accurate business and financial records

Our principles:

We maintain accurate and complete records of our business transactions and exercise caution and good judgement when confronted with any suspicious transactions or irregular practices. We understand that any inaccuracies could compromise our integrity.

What this means for our suppliers:

Suppliers are expected to maintain accurate and complete records of their business and financial transactions and ensure that these records are available for audit when requested.

3.4 Modern slavery and human rights

Our principles:

We believe that all employment should be freely chosen, that employees are free to leave the workplace at the end of their working day, and may leave their employment at any time once any contracted notice period has passed.

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

We do not accept child labour or any practice that inhibits the development of children. We respect and support responsible labour practices as set out in the UN Universal Declaration of Human Rights and the UN Global Compact.



What this means for our suppliers:

- 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 document, 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.

3.5 Fair pay and benefits

Our principles:

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, and that workers are paid in a timely manner. 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.
- Any overtime shall be voluntary and workers must receive adequate compensation for any overtime worked.
- Standard working hours must not exceed legal limits and over time must not exceed the maximum allowed by law. In the case that no legal limit is in place, basic working week cannot exceed 48 hours maximum.
- Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.
- Legally mandated benefits must be respected.



3.6 Diversity and inclusion

Our principles:

We maintain a culture of respect and equal opportunity in which individual success depends solely on personal ability and contribution. We will not tolerate any kind of discrimination, bullying or harassment. 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.
- 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.
- Suppliers must have a documented grievance procedure that all employees are aware of and is readily available to them.

3.7 Collective bargaining

Our principles:

We respect the right of all our people and those within our supply chain, to be involved in trade unions or collective bargaining agreements, and encourage open and honest communications.



What this means for our suppliers:

- Suppliers are expected to respect workers' choice of association to any trade union, workers council, workers committee, or similar, and also respect workers' rights to collective bargaining with their employer, without any discrimination. The relevant processes and laws on collective representation and consultation must be adhered to wherever applicable.
- Where the right to freedom of association and collective bargaining is restricted under law, the supplier facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

4 Acting with integrity

High standards of ethical behaviour and compliance with all applicable laws and regulations are essential to protecting the reputation and long-term success of our business. We expect suppliers to behave ethically, to comply with legal and industry requirements and seek to implement best practice in their industries.

4.1 Anti-bribery and corruption

Our principles:

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.
- Suppliers must only offer gifts or hospitality in an open and transparent way, and its gifts or hospitality must never be illegal. Where gifts or hospitality are offered, these should not be intended or interpreted as an attempt to improperly influence business decisions.
- Suppliers must not offer or make facilitation payments.
- Full compliance with any applicable anti bribery and corruption legislation or equivalent is essential.

4.2 Safeguarding our resources and respecting the confidential information of others

Our principles:

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 respect and protect anything which is the intellectual property of Belron.
- Suppliers must keep confidential information confidential and never use information which they should not have.
- Suppliers must never offer or supply information which Belron should not have.
- Suppliers must use appropriate nondisclosure or confidentiality agreements to protect our confidential and proprietary information.
- Suppliers must apply adequate data privacy and security protection to protect the personal information of our customers and employees from unauthorised access, use and disclosure. Suppliers who collect, use, store or have access to our customers' personal information must have adequate processes and procedures in place to monitor compliance with applicable privacy laws and contractual privacy obligations with Belron.

4.3 Export controls and import obligations

Our principles:

We are committed to compliance with import and export laws, regulations and procedures that apply to our operations globally.

What this means for our suppliers:

- Suppliers must comply with all relevant export control legislations when exporting goods or technology, and shall plan for and obtain all necessary authorisations and permits to ensure timely and compliant delivery of its products.
- Where an authorisation or permit so requires, suppliers shall also have in place all the necessary processes to manage access to export controlled goods or technology only by employees or other entities authorised to have such access.



4.4 Competitive behaviour and antitrust

Our principles:

We conduct our business in compliance with competition (antitrust) laws.

What this means for our suppliers:

- Suppliers must comply with all competition (antitrust) laws in the countries where they operate or sell their product.
- All forms of corruption, extortion or embezzlement are strictly prohibited. Bribes or other means of obtaining undue or improper advantage must not be offered or accepted.
- Suppliers must not coordinate market conduct with competitors or their own suppliers in a way that improperly restricts competition.

4.5 Preventing the facilitation of tax evasion and financial crime

Our principles:

We will not knowingly help our customers, suppliers or anyone else we work with to evade tax i.e. fraudulently under pay or not pay tax. We will not tolerate any forms of financial crime undertaken in any area of our business operations.

What this means for our suppliers:

- Suppliers must not ask us to do anything which helps them to evade tax.
- Suppliers must only raise invoices and other contractual documents which are true to the agreed commercial situation and which do not include any false information.
- Suppliers must not, when acting on our behalf, knowingly help others to evade tax.
- Suppliers must comply with all applicable financial crime laws and regulations including, but not limited to, bribery and corruption, fraud, market abuse, money laundering and financial sanctions.

4.6 Lobbying and political support

Our principles:

We are committed to undertaking any lobbying activities in compliance with all applicable laws, and to behaving ethically in all our interactions with governments, agencies and their representatives.

What this means for our suppliers:

- Suppliers must undertake any and all lobbying activities in compliance with all applicable laws.
- Suppliers are expected to behave ethically in all interactions with governments, their agencies and representatives.



5 Supplier commitment

5.1 Communication

We expect our suppliers to make the Code available to all their employees in the business language of their company.

5.2 Code adherence

Suppliers are expected to conform to all aspects of the Code, and Belron reserves the right to audit against compliance to any and all parts of it. Suppliers are expected to ensure that documentation is kept that demonstrates compliance with 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 supplier sites for audit purposes at any time. Belron reserves the right to terminate contracts in the event of a material breach of the principles set out in the Code, or to seek damages from any supplier who is proven to have breached any part of it.

Suppliers are required to disseminate these expectations throughout their own supply chain and incorporate the principles set out in this document as part of routine sustainable business practices.

5.3 Supplier ethical concerns

We believe that all our people and those within our supply chain have a responsibility to speak up and raise any concerns of any incidents not aligned with the behaviours set out in the Code. 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 its Belron contact, anonymously if required. Concerns may be raised either online or via telephone.

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