



Belron Canada Incorporated
Modern Slavery: Our approach to making a difference

Reporting Year:

January 1, 2023 to December 31, 2023.

Company Description

Belron Canada under Lebeau Vitres d'autos and Speedy Autoglass banners repairs or replaces and calibrates almost any type of glass of any make, model or age of vehicle. We serve over 370,000 customers every year, and we operate a fixed site service so that we can serve our customers wherever it's convenient for them. Vanfax is a wholesaler and distributor of vehicle replacement glass and other associated products. Each week we distribute circa 7,500 products across our network of branches. Belron Canada is part of the Belron group, whose purpose is to make a difference by solving people's problems with real care. Belron is the worldwide leader in vehicle glass repair and replacement and recalibration (VGRRR), with circa 29,000 employees, and operating in 37 countries, through wholly owned businesses and franchises. Belron Canada is a subsidiary of Belron International Limited.

The majority of products required for our core activities are in vehicle glass repair and replacement. They include, windscreens, other vehicle glass parts, associated accessories, and the tools and consumables required in our operations. Many of these are sourced globally through our parent company which also publishes a Modern Slavery Act statement (www.belron.com). We also source products for resale, and goods and services for use by the Canada business.

Our Responsible Business Framework

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

From a cultural perspective, Belron Canada has a long tradition of serving society, and throughout our entire history we have encouraged our people to give back and we have supported numerous charities, NGOs and community groups.

The Belron Canada's Responsible Business Framework (the 'Framework') 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
- Prioritize 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 BELRON® RESPONSIBLE BUSINESS FRAMEWORK



Our values & ethics

The Belron Code of Conduct (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 organization. The Code, which has been in place since 2010, remains an important part of Belron's way of working today. Training and communications around ethical behaviour are also conducted regularly.

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 other third parties to adopt similar standards of respect • Understand that we will not work with any organization that fails to uphold basic human rights or one that might cause the company embarrassment by their links to inappropriate organizations 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.

Company Policy Regarding Forced and Child Labour

Our parent company is a signatory to the United Nations Global Compact initiative which means we support 10 principles within four important areas: human rights, labour, the environment, and anticorruption. We choose our suppliers on clear and fair policies without bias or favouritism. They must all demonstrate that they are socially and environmentally responsible and have high standards of ethical behaviour and comply with all relevant legislation. Our Way of Working also sets out our approach with regards to human rights and labour conditions.

Relationships with our partners and suppliers are based on integrity and to ensure they are in line with our sustainable procurement policy. We encourage our people to speak up if they witness any behaviour which concerns them. Everyone, regardless of roles, has a responsibility to speak up and challenge if they are asked to do something or are witness to something, which is not aligned to our principles and ethical standards. They can contact their line manager, HR advisor, or if they would rather do so anonymously, they can report through our independently managed “Speak Up” line. All reports to the “Speak Up” line are investigated, and appropriate actions taken.

For our material suppliers, our Supplier’s Code of Conduct, which was updated in 2020, includes our expectations in relation to human rights and labour conditions; These suppliers are required to comply with the Supplier Code of Conduct when they supply their products and services to us.

We recognize that Modern Slavery is a growing global issue that can occur throughout the supply chain, and we understand our responsibility to prevent the risks of human trafficking, forced, bonded and child labour, and to respect human rights in our business and supply chain. For this reason, regular meetings are in place to understand all potential risks related to our business operations and to review the effectiveness of the company’s processes to combat slavery and human trafficking in our supply chain. We then put in place steps that are aimed at ensuring that there is no slavery or human trafficking within our



own business and supply chains. The potential for Modern Slavery is one of the key risks we assess in our internal and external assessments and our review of our supply chain.

Forced and Child Labour Risk Assessment

For the part of the Canadian Supply Chain that is managed within Group Procurement, all of these risk areas are assessed as part of our Group Sustainable Procurement program. We use the assumption that all of the suppliers and categories managed within the Group Procurement Team carry a risk of Modern Slavery, and we take all the suppliers in scope of this program through the complete Due Diligence process. The program assesses these risks through:

- 1) Remote assessments of suppliers,
- 2) on-site audits of all tier 1 supplier sites and key upstream (tier2+) sites, and
- 3) validation that our tier 1 suppliers run assessments and due diligence programs at their upstream supplier sites. For further information see the attached documents outlining the Due Diligence Process, MS risk ratings, and Audit content.

For the part of the Canadian Supply Chain that is managed outside Group Procurement Team, the risks have yet to be assessed in the Sustainable Group Procurement program. The plan will be to have this started in 2024.

To date, we have not identified any forced labour or child labour in our activities and supply chains. As such we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

We complete a periodic assessment of our program and its effectiveness via third part audit, and review / assessment by both independent Modern Slavery experts and audit providers.

Our Due Diligence process



Sustainable Procurement Responsible Disengagement Policy

The following is intended to provide guidance on any required disengagement from suppliers in a manner that both protect the interests of Belron Canada and those of all external stakeholders implicated by the disengagement.

Suppliers are categorized into 3 tiers based on:

- 1) The % of the suppliers' business capacity that is taken by Belron
- 2) The overall length of relationship

Guideline actions to be taken for each tier are:

Tier 1 - 50% and over 10 years

- Belron Canada's Executive Leadership Team (ELT) to discuss directly with the supplier's senior management team. Decision should not be communicated by email in isolation and should ideally be face to face unless there is a particular reason not to do so.
- Belron Canada's Executive Leadership Team (ELT) to be informed and made aware of the reasoning and timelines ahead of any communication to the supplier and to sign off the action.
- A progressive withdrawal is recommended, taken in a step-by-step manner rather than an immediate drop off – up to a suggested maximum 6 months.

Tier 2 - 10-25% and over 5 years

- Belron senior management team to discuss directly with Supplier senior management team. Decision should not be communicated by email in isolation and should ideally be face to face unless there is a particular reason not to do so.
- A progressive withdrawal is recommended, taken in a step-by-step manner rather than an immediate drop off – up to a suggested maximum of the remaining contract term, or a maximum of 12 months.

Tier 3 - 10% or under and 5 years or under

- Immediate disengagement is acceptable unless there are any specific circumstances to consider.

Training and Recruitment

With regards to recruitment, we follow a rigorous process that includes carrying out appropriate checks regarding each individual's identity, permanent work documents to eligibility to work in Canada and criminal background check. Once recruited, all employees are under a full- or part-time employment contract and follow an induction process that includes Our Way of Working which describes the behaviours we expect of everyone who is employed by us and those with whom we partner. Our people are committed to ensuring that discrimination, harassment, and bullying are all deemed unacceptable, and we ensure that everyone's human rights are respected. We state our position via a number of policies such as Diversity and inclusion policy, code of conduct and Workplace violence and harassment. For each of them, our employees engage themselves to comply.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Michel Savard, President

I have the authority to bind Belron Canada Incorporated.

Date : 22 May 2024