



Our Way of Working

Code of Ethics for the Belron® group

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Our Way of Working:

Foreword by Gary Lubner

Our ambition is to become the natural choice for vehicle glass repair and replacement across the world.

We will achieve this in a number of ways including being world famous for customer service, building our business with extraordinary people who deliver extraordinary performance, having exceptional brands and by developing outstanding business partnerships.

Above all we will reach these goals by maintaining our reputation for being a trusted and respected company and by ensuring that we behave in a responsible way in everything that we do.

This has always been Our Way of Working across the Belron® Group. But as we grow, and as Belron® moves into new and more complex markets, we need to be clear about the behaviours that we expect within the business, of each other, and of those that we work with.

Our strategy is simple but it is the way in which we operate our business that makes us stand out from our competition and enables us to be the industry leader in every country in which we operate. It is Our Way of Working that differentiates us.

That is why we are committed to bringing Our Way of Working to life at Belron®. This document describes clearly our principles and how they should inform and guide the decisions we make at work each day. We all have a responsibility to follow these principles and to demonstrate our high ethical standards. By doing so we believe we will be the world's natural choice.



Gary Lubner, CEO of Belron®

Our Principles: Integrity, Respect & Trust

Over the years we have managed our business by operating according to three guiding principles:

Integrity

We build confidence with others through what we say and what we do.

Respect

We demonstrate consideration for each other and for our environment.

Trust

We are consistent in our actions, morals and methods, ensuring things are done the right way at all times.

These principles guide the decisions and support the actions of everyone in Belron®, wherever they may be in the world. You will find these principles at the heart of every one of our Business Units, guiding what we do every day. As we grow it makes good sense to formalise the principles to protect what has made us a success, and ensure we continue to operate in an ethical and consistent manner.

That is why we have decided to produce Our Way of Working. We want to be clear about the behaviours that we expect of everyone who works for Belron®, and we want to provide support to anyone who is faced with a situation which may affect their time at work or the reputation of the business.

Our three principles are not new. We demonstrate them daily in what we say and how we act. What is new is that we have now articulated them to remind us all about what makes us successful, to make them clear for new employees, and to communicate them to our business partners and suppliers who work with us.

When using this code always keep in mind that:

Compliance with our code of ethics as established in Our Way of Working is not optional.

All employees must be familiar with Our Way of Working and are expected to act in accordance with its principles at all times.

You don't need to keep ethical concerns to yourself – you are encouraged to speak up and disclose the matter or seek guidance if you need it.

Our Way of Working is for everyone at Belron®. It protects us and our standard of excellence, and is our assurance that we will continue to be the leader in our industry and beyond.

How to use this code

Our code of ethics is a reference to helping all of us demonstrate the guiding principles of integrity, respect and trust, and to follow Our Way of Working wherever Belron® may operate. It explains the expected standards of behaviour for every Belron® employee, from the executive team to the newest recruit.

We have designed the code to help us determine the right course of action, for instance in conversations with colleagues, in dealing with customers, or in situations involving suppliers. Sometimes we may be faced with difficult circumstances in our working lives and this code has been created to help you through these. Some of it may just seem common sense and good judgement and much of it is; however in some circumstances the right thing to do may not be clear. Our Way of Working is a tool to support and guide us in our day-to-day business decisions.

Our Way of Working is divided into three main areas to cover how we work as a business:

- How We Work Together
- How We Work With Others
- How We Manage the Business

Each section is designed to explain the different policies that are relevant to those particular relationships. The policy is explained, the behaviours expected are articulated, and each policy is supported with a Question and Answer (Q&A) to demonstrate how these issues may arise in our business and how to resolve them. There will of course be situations and circumstances which are not directly covered in this document.

You should ask yourself the following questions:

- Is what I'm doing legal?
- Is it in line with the spirit of our core principles of integrity, respect and trust?
- Could I explain my actions comfortably if asked by a friend or family member?
- Could what I do put the company's reputation at risk?
- Who will be affected by my decision and could they see it as unethical?

Asking yourself these questions before you act will allow you to better evaluate choices and make decisions. If you are in any doubt, you should seek help and guidance before you proceed any further by raising the issue with your manager.

Always Remember

You Are Encouraged to Speak Up

It is important for the success of our business that we all feel comfortable about discussing difficult and sensitive business decisions and situations in an appropriate way. It is equally important that we feel confident in drawing attention to behaviour we feel is unacceptable and which may contravene this code.

We will treat seriously any report or complaint that is made in good faith regarding the conduct of others or the company. Any concerns will be properly investigated in a fair and effective manner. We will not tolerate any retaliation or reprisal for reporting suspected infringements. Any such behaviour goes against our core principles and the spirit of this code.

If you have any questions about Our Way of Working or the proper behaviour in a certain situation, first consult your line manager. If your manager is unavailable or if you are uncomfortable discussing the matter with your manager, you can also contact a senior HR manager, the Belron® Ethics Team, or use the Speak Up line (see the following section for details).

Help & Guidance is Available

As we grow as a global business, Belron® is committed to ensuring that all employees have the knowledge, resources and support to act according to Our Way of Working. We must all be willing to ask for guidance when needed and know that the support is there when we do.

The Law, Local Customs and Policies

This code sets out the minimum set of policies across the Belron® group. In certain situations we may have supplementary policies for some business activities or there may be more stringent local regulations or business practices.

All employees are responsible for ensuring they understand any additional policies and procedures or local laws that apply. The law should always be upheld.

Managers Have Additional Responsibilities

Managers and supervisors have a duty to ensure that their employees are aware of and understand this code and adhere to its policies. Managers are also responsible for providing guidance and for addressing any legitimate concerns in an open way and for dealing with them in a professional and appropriate manner.

Q Why do we need a code of ethics?

A The Belron® code of ethics sets out our commitment to being a responsible business by providing guidance on what is expected of each of us in order for us to operate according to our core principles of Integrity, Respect and Trust. It also makes reference to other important Belron® policies and guidelines.

Q Does this code contain everything I need to know about how to do my job?

A No. The code cannot detail every policy and procedure in the company or the technical or skills based information you need to perform your role professionally and with confidence.

You are responsible for learning about the policies and procedures and all applicable laws that will help you to conduct your role. HR can help you with the relevant policies for you.

This code provides you with guidance on the right course of action to take should you be faced with any sort of ethical dilemma and to help you to understand the Belron® principles of Trust, Integrity and Respect and how they guide Our Way of Working.

Q As a manager, what kind of questions should I expect to handle?

A You are there to help with any matter relating to the code and Belron® policies on which your team are asking for guidance or if someone is unsure about the right thing to do. If you believe a law or a policy may be being broken you must report this. Your line manager is generally your first point of contact in such cases. However there are other channels available to you – your General Manager or HR Director, the Belron® Ethics Team, or the Speak Up line if the situation is such that you would prefer to speak to someone else.

You should treat all matters escalated to you in confidence and good faith until such a point that there is a need to disclose the identity of the person making the complaint.

Speaking Up

The Speak Up Line

As part of your employment, you are responsible to raise concerns about possible violations of the law, regulations, or this code. In the first instance, you should report concerns to your line manager or another senior manager in the business.

We have also set up a Speak Up line for all employees to use. This has been established as an independent, confidential resource to raise concerns about ethics within the business, or to make a report when it is felt that a law or the principles in this code are being broken. The Speak Up line is managed independently by an external company with staff who understand Our Way of Working and are trained to deal with your call.

If you raise a concern via the Speak Up line you can be assured of anonymity if you ask for it. When you use the Speak Up line a report will be created and we will ensure that your concern is taken seriously. Depending on the nature of your complaint, a formal investigation may be initiated.

Q How do I use the Speak Up line?

A You can contact the Speak Up line by email or telephone. The contacts are listed at the back of Our Way of Working, and on the intranet.

Q If I have an issue, who should I contact? My manager is always quite busy – should I just go to the Speak Up line?

A Your line manager is there to help you deal with any concern you might have, and has received training and support to deal with your question. Your line manager should be the first point of contact – but if you feel uncomfortable speaking to them for whatever reason, you may approach another senior manager. If they are also unavailable, then the Speak Up line should be used.

The important thing to remember is that you must speak up whenever you have a concern about behaviours that are not representative of our principles or Our Way of Working.

Q The issue I am concerned about involves my manager. What should I do?

A Use the Speak Up line. All calls are treated confidentially and you can report the issue anonymously if you would prefer to. It is always better to raise a concern and we will treat all concerns made in good faith properly.





How We Work Together

We spend a large part of our lives at work so it's important that our working environment and relationships are as good as they can be.

Our core principles of integrity, respect and trust should drive the way that we work together and treat each other. To meet our goal of being an employer of choice we want to create positive, responsible and open working environments wherever we operate.

This section sets out the Belron® way of working together.

Health, Safety & Security

Health and safety requires us to respect each other's well being in everything that we do. All of us at Belron® are expected to behave in a way that ensures we create safe working environments for employees, customers and suppliers.

We must all encourage a culture that supports a proactive attitude towards health and safety by following all regulations and requirements as applied to our location and type of work.

We will provide everyone with the correct training and skills to feel confident in their role including stringent safety procedures for our technicians so that they can deliver the highest technical standards.

We will minimise the hazards inherent in our working environment and will report anything that poses a threat to health, safety and security. This means that we will meet or exceed all health, safety and security laws and regulations in every country in which we operate.

We all need to:
Understand and follow the company's rules on health, safety and security, integrate these rules into our daily routines and be aware of and act in accordance with the correct procedures for our

role. This includes making these rules clear and available to everyone.

Know that anyone who drives a vehicle for Belron® must act legally and responsibly at all times. This includes holding a valid driving licence and never driving without due care and attention.

Take all the necessary steps to prevent accidents and injuries to ourselves, our colleagues and members of the public.

Challenge any unsafe behaviours you see, take responsibility for the safety of others, and report any accidents or anything that might cause injury or hazard in the workplace as soon as possible.

Ensure that we have the proper training and are equipped to do our jobs and manage any risks responsibly. This includes ensuring that we wear all of the required protective equipment and that we understand and carry out all the necessary work procedures for the task.

Promote fair, transparent and competitive working conditions and maintain professional facilities.

Avoid exposing anyone to a situation that may threaten their own personal security.

Q I have just discovered that one of our drivers has lied on his application with a fake driving licence, and is under age. He says his family is in financial distress and would greatly appreciate the work opportunity. He has been a willing and hard worker so far, and has not been a problem. What should we do?

A Unfortunately, we have to adhere to the law and are not allowed to hire drivers without a valid driving license. You must speak to the driver and inform him that for his safety and the safety of others he cannot be in the position without a license. You could talk to HR about alternative positions that could be considered.

Q I recently had an accident at work on some loose floor covering. I didn't hurt myself but someone told me I should report it anyway. We have a very good safety record in our region and I don't want to jeopardise this. What should I do?

A You should always bring to the attention of your manager any near misses or issues that could cause an accident. By doing this we can rectify problems before they can really cause serious accidents and ensure that our working environment is as safe as it can be.

Q One of my colleagues is persistently working without using the correct personal protection equipment (PPE). He's been working for the company for several years and uses old goggles that are out of date and probably not safe anymore. He's been around longer than I have and says he knows better. What should I do?

A When it comes to safety we must take responsibility for others, and challenge any behaviours that might be unsafe. In the first instance the best thing to do would be to remind your colleague why using PPE is so important. If you have done this or you feel uncertain about raising the issue with your colleague then reporting it to your line manager would be the right thing to do.



Drugs & Alcohol

Respecting the safety of others means taking care of our own health, and taking responsibility for our actions to ensure we don't endanger others.

Working under the influence of drugs or alcohol can put ourselves, and others at risk. We should encourage a culture that respects when drinking is appropriate, and what level will not put ourselves at harm.

The possession of drugs on company premises, including company vehicles, is prohibited at all times.

We all need to:

Be aware that driving or operating machinery whilst under the influence of alcohol or drugs is against the law, this code and can endanger the lives of yourself and others.

Mention this code to colleagues who may be tempted to drink at inappropriate times.

Inform our line manager or HR if we believe one of our colleagues may be under the influence of drugs or alcohol.

Q I saw one of my colleagues throw a can of beer in the bin as he got out of his van. What should I do?

A The use of alcohol can endanger our ability to drive a vehicle or conduct our work. Whilst at work the health and safety of our employees and our customers must be put first. Whilst throwing a can in the bin does not necessarily mean that your colleague was drinking it is best to tell your branch manager so that he can address the situation directly with your colleague. If nothing else it looks unprofessional to have alcohol in our vehicles.

Q One of my colleagues has mentioned that he uses drugs, although he has assured me that he never uses them at work. He's a good friend and I'm worried about him. I don't want to abuse his confidence. Should I tell my manager?

A Respecting others means that we support each other. Ask your friend if he wants help. If you have not seen him using drugs at work, or if you do not believe he is working under the influence, you do not have to inform your manager. If at any time you feel that the situation changes, however, you should speak to your manager immediately. Your friend could be putting himself and others at risk.

Discrimination, Harassment & Bullying

It goes without saying that a fundamental way of eliminating discrimination is through respect. We are committed to a working environment in which everyone is valued and treated with respect and we encourage diversity in our workplace.

We must all ensure that we develop relationships that are respectful, business-like and free of bias, harassment and violence and all of our Business Units will have policies in place to uphold this ambition.

We expect everyone to be honest and courteous to each another and we must all work to promote working environments where people feel free to raise questions, express criticism, provide encouragement and give praise and recognition.

We all have the right to expect that we will be treated with respect and dignity and that there will be fair treatment for all.

We all need to:
Never engage in bullying or subject others to verbal, racial, psychological, physical, sexual or any other form of harassment or abuse.

Be clear that any form of discrimination based on race, nationality, religion, age, disability, gender, marital status, sexual orientation, pregnancy, union membership or political affiliation is unacceptable when working for Belron®.

Understand that behaviour that challenges these policies will not be tolerated anywhere. We must immediately stop any behaviour that we have been told is unwanted or that is unlawful and we are all expected to report any behaviour of this nature if it occurs.

Understand and comply with all laws governing fair and equal employment opportunities.

Ensure that the correct procedures are in place should such situations arise to deal with them promptly and effectively.

Conduct business fairly and without bias. We must all recruit, train and promote employees on the basis of their ability and suitability for the job.

Ensure that our business partners, suppliers and customers are aware of our commitments to equal opportunities and diversity.

Q My line manager has really high standards and wants us and the department to perform well. However he can be really intimidating and he has made one or two remarks to members of the team that have been personally insulting. His behaviour is now affecting morale and people are talking about leaving. What should I do?

A Behaving in an intimidating way or a way in which someone feels bullied is unacceptable at any level within Belron®. In the first instance you should try raising the issue with your manager and explain why you find his behaviour inappropriate. If he does not change his behaviour or if you feel uncomfortable doing this then you should raise the matter with your HR representative, or you can use the Speak Up line to raise a report.

Q We have had an application for a technician's position from a young female. There is lots of lifting involved in this job and there may be late nights and shift work required too. Should I turn her down for interview?

A By doing so you would not only be breaching this code of ethics but potentially breaking the law. If the candidate has the ability to do the job you must not discriminate against them and should interview them and consider them for the role irrespective of their age or gender.

Q A new female colleague has just started at work. She has made a remark about a calendar on the kitchen wall with girls in swimsuits. We've always had the calendar up and I don't see what the problem is with it.

A We must make our working environment comfortable for everyone in the team. Your colleague might feel intimidated by the pictures on the calendar and it could affect her time at work. Taking down the calendar would demonstrate that you respect and welcome her to the team.



Conflicts of Interest

Our personal integrity, as well as our integrity as a business, is at risk when our reputation is damaged. We all have a duty to ensure that we do not put ourselves into any situation where our direct or indirect personal interests might conflict with the interests of Belron® or one of its Business Units.

Information received by us in the course of our work may not be used for our own gain or for the gain of our families and friends or any third party.

Conflicts of interest include using business knowledge for personal gain and directing business to a supplier because that supplier is owned, managed by or employs a relative or friend.

Any personal interests or interests of our immediate family or household in relation to the company’s business must be disclosed.

Even the appearance of a conflict of interest can be damaging to our reputation as a business.

We all need to:
Avoid situations where our personal interests could conflict with Belron® and/or our business units.

Never use our position within Belron® for our own benefit or for the gain of someone we know directly or indirectly.

Know that the best way to deal with any conflict or potential conflict of interest is to report it in full immediately to your line manager.

Ensure that we know that a conflict may arise with any member of our family, household, or anyone else that we may have knowingly or unknowingly influenced or been in contact with.

Know that we will take seriously any conflict of interest that arises that has not previously been disclosed.

Know that General Managers or a member of the GLTM must sign the Conflicts of Interest Disclosure Form.

Q A family member is looking for a job and there is an opening in my team for which I think they are perfectly suited. I am worried about suggesting it though given they are related to me. What should I do?

A If you feel that this person is suitably qualified you should mention it to HR or the person managing the recruitment process. However you should have no involvement in the hiring process and it should not be a position that you directly supervise.

Q My sister has started a printing business and would like to become a supplier to Belron®. May I tell her about company projects which may need to outsource the printing? I am not in a position to make decisions on printing contracts, but can I direct her to the appropriate person in the company?

A Even if you are not directly involved in printing contracts, you should avoid giving the appearance of a conflict of interest. Explain the company’s policy to your sister, make your manager aware of her interest, and ask her to contact the purchasing department or the project manager directly. Avoid getting involved in the business relationship; for example, you should not seek to exert influence or should not be involved in any presentation your sister may need to do to secure the business.



Use of Company Assets

Belron® trusts that its employees will not abuse the assets of the business. Company resources are available to all employees in order to support us in achieving our business objectives and to give employees the necessary tools to succeed.

Company assets include time and physical and intellectual property and should be used for business purposes only. Belron® may monitor the use of its resources and see the information that you create or exchange with others.

We will not tolerate company assets being used for immoral or illegal purposes or for personal gain.

We all need to:
As a general rule avoid the personal use of company assets. Incidental or occasional use of communication tools such as e-mail, telephone and the internet may be acceptable as long as it does not get in the way of you performing your job and does not result in unreasonable costs to the business.

Be responsible for any company equipment or assets loaned to us and ensure that they are not lost, damaged, misused or stolen.

Ensure that we do not lend, sell or donate company assets or property to others without authorisation.

Know that under no circumstances must our electronic communication equipment and related services be used for receiving or accessing, downloading, creating or forwarding illegal, offensive, obscene or otherwise inappropriate materials, e-mail, documents or images.

Ensure we do not install or use hardware or software on any Belron® system that has not been specifically approved by the IT Team in order to protect our electronic equipment from unauthorised external access or use.

Follow the guidance provided relating to computer usage, including usernames and passwords, security measures and software and hardware download policies.

Q What do you mean by “intellectual property”?

A This refers to what we create when we are at work – from reports we write to the design of our brand identity. Anything made by an employee while at Belron® is considered intellectual property which is an asset of the company.

Q My brother works for a competitor down the road. He has asked me to lend him a windscreen which he will replace in a day or so. He is my brother so I know he will keep his word. Is this ok?

A Aside from the conflict of interest, this is a misuse of the company’s stock. If your brother does not return the glass you could find yourself accused of theft. Even if he does return it, how can we be sure it is of the same quality? On top of that, we might not be able to serve one of our customers if the glass has gone to your brother. You should not lend him the windscreen.

Q I am currently taking evening classes at the local university to get a further qualification. I sometimes use my company computer and printer to type up assignments. I do the work in my own time during my lunch break and in the evening. Is this allowed?

A Occasional use of the computer during non-work hours is allowed as long as it is not interfering with your company work commitments and as long as the work you do is legal. Excessive use where a cost might be incurred by Belron® would not be appropriate. Talk to your line manager or HR for additional guidance. You should also consult the IT policy as this can give you more information on policies such as using computers to download material from the internet and installing software.



Giving Back

We respect our role as a corporate citizen and giving back is an important part of Our Way of Working. We are determined to play an active role in our local, national and global communities in keeping with our principles and we encourage our employees to do the same.

Belron® recognises the value of supporting our communities and believes that the best way for us to provide support to those who need it is through Giving Back strategies driven locally by our business units.

We will inspire action in every business unit to ensure that we make a positive impact in the countries and the communities in which we operate.

We all need to:

Provide support responsibly by only working with recognised charities. We understand that there will be some causes or entities that we cannot support as a business and will not donate to. For further guidelines please refer to the Giving Back policy on the ethics website.

Ensure that we don't use funds or resources to support activities that are not covered in the Giving Back policy or make a donation on behalf of Belron® at the request of a customer or business partner without first obtaining approval from the Finance Director.

Understand that financial contributions provide important benefits to communities and charitable organisations but getting actively involved can deliver more value. We should seek out these opportunities as well as financial contributions.

Q I have been asked by a supplier to sponsor them in an upcoming marathon. Can I do this?

A There will be a company policy on making donations or sponsoring on behalf of the company. You should ask your line manager or HR what local support you can provide before making any commitments and for transparency.

Q I am a volunteer at a local hospital and they would like to get Belron® more involved. How do I go about arranging this?

A Before making any commitment on behalf of Belron® you should speak to your line manager to understand what the business approach to corporate involvement and personal volunteering is. Belron® encourages the support of community and charitable activity but it is important to ensure it is in line with your Business Unit's approach to Giving Back. There may be the opportunity to develop this further but you should be aware that we have to make the difficult decision to limit the support we provide to good causes so that we can be a lot more focussed in our efforts in this area.



How We Work with Others

Our goal is to delight our customers every time we serve them. Our reputation and the achievement of this ambition depend on the confidence others have in our professional excellence and in the quality of the service that we provide. This is built upon the trust they have in our service, and our integrity as a global brand.

In addition, the relationship we have with our suppliers is key to our success. We work closely with insurers to bring value to our customers. And as a global company, we operate supply chains in countries worldwide. Our business partners expect us to be honest in our operations and across every aspect of dealing with them. This respect for the partnerships we have built is crucial to Our Way of Working.

This section focuses on how we build and maintain our reputation with customers, through serving them directly, and by how we work with our suppliers and partners.

Dealing with Our Customers

Integrity, respect and trust are at the heart of the relationship we have with our customers. Maintaining a high standard of customer service is crucial to making Belron® the leading company in our industry and beyond.

We will be open and honest in our dealings with our customers and we will ensure that we carry this through in all our decisions.

We will constantly measure and monitor how our customers feel and use this to drive even better service. And we will recognise the people who already provide exceptional service and celebrate their success.

We will respond positively and promptly to customer complaints, claims and enquiries made in good faith and do all we can to turn unhappy customers into satisfied ambassadors.

We all need to:
Be and look professional at all times.

Be committed to building relationships with our customers and to enhancing their experience with Belron®.

Communicate in an honest and truthful manner with every customer and in a way that is not misleading.

Ensure that our customers are kept well informed.

Deal with all customer enquiries on an individual basis.

Only charge our partners for the work that we do.

Own up to any damage we do to a motorist's vehicle.

Q I was on my way to a job and realised I'd forgotten my uniform. Rather than go back to get it and risk arriving late, I thought it would be best to just get the job done.

A Our customers respect and trust the Belron® brand, and you are an ambassador for the company whenever you are at work. Wearing the uniform gives the customer assurance that they are going to receive a quality service. It is important that we take the time to make every customer experience delightful, and looking professional is part of that.

Q I accidentally scratched a customer's BMW while replacing the windscreen last week. What should I do?

A Honesty is the best policy and no matter what has happened, we believe in being open and owning up to our mistakes when we make them. Inform your line manager immediately, who will work with you to let the customer know about the unfortunate incident and make appropriate amends.

Quality of Our Service & Products

Quality is crucial for us to maintain a strong relationship based on trust with customers.

We set stringent specifications for the safety and quality of the glass that we buy and manufacture and for the way that we deliver and fit it. We only buy our glass and adhesives from reputable suppliers, almost exclusively being the same suppliers as used by the world’s vehicle manufacturers for original production.

We all need to:
Be committed to providing high quality services and products to our customers.

Inspect every single piece of glass before we fit it to ensure that it has been approved and marked with all the relevant regulation markings and safety standards.

Carry out a pre-inspection of the car ensuring that, where the motorist is present, we get the motorist’s agreement and if not we inform our manager of any damage before starting work. If the motorist isn’t present let our branch manager know.

Ensure we follow the correct procedures for the task and only use approved Belron® equipment as detailed in the Technical Handbook.

Have the necessary respect for our customers’ property and take all the necessary protective measures as listed in the Belron® Technical handbook.

Q I am aware that one of my colleagues has been skipping several steps in the procedure when replacing vehicle glass. I understand that the work load has been particularly heavy this month and we have been under a lot of pressure to get jobs done. However, I feel uneasy about this. Should I bring it up with my manager? Will he get into trouble because of this?

A Checks are put in place for a reason. They are critical to providing quality and ensuring the safety of our people and our customers and we will not tolerate anyone cutting corners. You should inform your line manager immediately, they can investigate and will know how to handle this situation.

Q A shipment of glass has arrived from a new supplier that does not appear to be our usual standard of supply. What should I be looking for and who do I contact if I feel that my suspicions are correct?

A We must inspect every single piece of glass before it is installed. The shipment should be checked for the required safety standard and regulation labels. If these are not present, the glass is not up to the standard that is acceptable for Belron®. You should speak to your line manager immediately if you are ever concerned about the quality of our products.

Relationships with Our Suppliers & Partners

The relationship we have with our business partners is key to our success, and is supported by our ethical principles. Our aim is to develop professional relationships with our suppliers and to achieve quality and efficiency for mutual benefit.

We are committed to treating suppliers appropriately and building relationships which are based on trust, courtesy and promptness.

Our business partners expect us to be honest in our operations and across every aspect of dealing with them.

We all need to:
Choose suppliers based on clear and fair processes without bias or favouritism.

Where possible favour suppliers who not only meet our supply requirements but who can demonstrate socially and environmentally responsible policies and high standards of ethical behaviour.

Select suppliers who obey the law and respect the wellbeing of their employees, contractors, local communities and other stakeholders.

Ensure that agreed purchasing terms are clear and understood by all parties.

Pay our suppliers in accordance with agreed terms and only change them with prior agreement.

Check the business practices of suppliers for quality and compatibility with Our Way of Working.

Understand that we may end relationships with suppliers who continually fail to meet our standards of quality or business practice.

Respect the confidentiality of information shared with and by our suppliers.

Q Why does Belron® care how other companies operate their business?

A We have a responsibility to ensure that all aspects of our own operations are ethical and meet the standards set out in Our Way of Working, which extends to who we work with. This is reinforced by our guiding principle of integrity, and a relationship based upon trust between Belron® and our suppliers. Our customers see us as one business so it is important that we extend our ethical commitments beyond our own operations.

Q A supplier contacted me to complain about late payment of invoices. I reviewed the contract and our payment policy was not explicitly mentioned. Do our payment practices conform to industry standards, and how can I find information that will help me explain the policy to this supplier?

A The Belron® practices and policies are reviewed and maintained by the purchasing department and senior management. You should discuss the contract and the supplier with your manager, and seek a discussion on company practices with the appropriate manager in purchasing or in finance.

Data Protection

We all have a right to privacy and we must trust that, as a business, we will uphold this right. The disclosure of any personal information that we hold is potentially harmful to our business.

We must all take responsibility for ensuring that we keep confidential all of the customer, employee, supplier and company information that we hold. This includes information obtained by our business partners and provided to us. This also includes data and confidential information provided under non-disclosure agreements.

Everyone must understand and comply with all relevant policies, guidelines and rules governing data protection and privacy.

Personal data must only be used for the business purposes of Belron® and must not be held for longer than is reasonably necessary.

We all need to:
Take every step to ensure the confidentiality of customer, employee, supplier and company data and the right to privacy.

Keep all personal information gathered in the course of business confidential and ensure that it is kept securely and not divulged beyond those who legitimately need to know it for stated business purposes.

Comply with the policies and procedures in place for the security, use, management, disposal and retention of data. All of us must follow these procedures.

Understand that in some countries compliance with data protection and privacy regulations is required by law and failure to do so can result in criminal investigations for individuals and for Belron®.

Be responsible for securely storing any customer, employee or company data that we may be responsible for or have access to.

Q My colleague has been resting at home from an operation and I would like to send him a get-well present. However the HR department refuses to pass on his home address, stating data protection concerns. Surely this cannot be a violation given that I am his friend and colleague?

A The HR department is right not to hand over the home address. We take every step to ensure the confidentiality of employee data and their right to privacy. Such information is kept secure and not divulged beyond those who legitimately need to know for specific business purposes. Give the present to HR and ask them to forward it to him for you.

Q The other day a laptop computer was left in the lunch room unattended. Who should I have reported this to?

A Computers contain personal and business sensitive data and should be safeguarded at all times. If it was clear who the computer belonged to, you should make the owner aware that they have forgotten it, otherwise speak to your line manager or HR. You also have a duty not to disclose any confidential information that may have been visible on the screen.

Gifts & Entertainment

Gifts, hospitality and entertainment can help to build and develop our business relationships.

But they can give rise to embarrassing situations and may be seen as improper inducement to give something in return.

Our integrity must be upheld at all times, and accepting some types of gifts could undermine this principle.

Entertainment or gifts that give, or could be seen as giving, benefit or advantage to the recipient or the provider must not be accepted.

Favours must not be solicited and gifts of money should never be offered or accepted.

We all need to:

Ensure that we make our line manager aware of all gifts and entertainment that we offer, or that we accept, which could be regarded as excessive and when in doubt seek our line manager’s prior approval.

Comply with local rules of the giving and receiving of gifts.

Always consider whether the gift or hospitality that is being offered could imply or lead to any obligation.

Make sure that we never solicit gifts and favours and know that gifts of money should never be accepted.

Ensure that all gifts and entertainment offered are appropriate and in line with our principles.

Be clear about what is acceptable in our business relationships and share these guidelines if appropriate. It may be beneficial to enquire about the business partner’s policy on these issues to avoid any misunderstandings.

Be particularly cautious of any dealings with government officials. No gifts or entertainment may be given to, or paid on behalf of any government or military official without the prior written approval of the Belron® Legal Team.

Q I would like to buy a gift for a supplier as they have done a great job of sorting out an issue we had with a delivery. Is it acceptable for me to buy the gift using my own money and then claim it back through expenses?

A Any gifts or entertainment must be properly accounted for. Even if you buy the gift yourself and claim on expenses you are still offering the gift as a representative of Belron®. You should seek prior approval from your line manager to check that this gesture could not imply or mean any obligation and record it if required.

Q What is a gift register?

A This is simply a log of all the gifts received by employees or given to our business partners. It is put in place to ensure transparency and to uphold our principles of trust and integrity. The registry will be held by the HR or Legal Team – speak to your line manager if you need to disclose a gift you have given or received.

Q I have been taken out to lunch by a supplier and they also gave me a promotional gift. Do I need to tell my manager or register them?

A Reasonable business-related entertainment that builds goodwill and a positive working relationship for Belron® can be provided or accepted if it is modest and occasional. We should only ever offer or accept gifts of nominal or modest value. However, you could let your manager know about the gift.

Q I heard a colleague boasting that he had been given a tip from a customer for fixing his windscreen wiper when replacing the windscreen. I didn’t think we were allowed tips, but I don’t want to get him into trouble. What should I do?

A Tips are becoming more widely accepted across Belron®, and can demonstrate that someone has given excellent customer service. You should mention this incident in confidence to your line manager so that they can reiterate the company policy to all members of staff. Tips should never be expected from a customer – we will continue to deliver the same high level of customer service regardless of gratuities.

Bribery & Corruption

Our ethical principles are in place to ensure that offences such as bribery and corruption are not tolerated within the business. We believe that no one should obtain or retain business through coercion. Even the suggestion of such action could seriously damage the reputation of Belron®.

We will not condone under any circumstance the offering or receiving of bribes or any other form of improper payment.

Bribery and corruption is illegal in most countries and a breach of these laws can lead to imprisonment for individuals and fines for the company.

We will not accept or offer money to induce favourable treatment for Belron® including the acceptance or donation of money to any employee of a government organisation or a government official.

We all need to:
Ensure that we never make payments, gifts or entertainment to any government official without prior written approval of the Legal Team.

Never offer or accept bribes including facilitation payments or any other form of improper payments. Any breach of these rules, even if only suspected, should be reported.

Never promise or give money, services, gifts or anything else that may be excessive and/or be thought of as influencing or intending to influence the decision of others.

Ensure that if we find ourselves in a situation where payment would be unavoidable, we do not keep it to ourselves. Inform your line manager and the Legal Team immediately.

Q Working with a new supplier, I have been told that it will make shipping easier if we make a payment to customs officials in the country of origin to get the products cleared through customs. Obviously we need the shipment to arrive as soon as possible. Can we make the payment?

A We must never make payments to government officials in the form of gratuities as these can be considered to be forms of bribery. In many countries this is in fact illegal; and it is strictly against Our Way of Working. Speak to your line manager or Legal Team to find out the most acceptable way of receiving the shipment. Your line manager should also advise on ways of working with the supplier who recommended the payment.

Q What types of legislation are in force regarding bribes and payments to officials?

A Most countries have laws in place that make it illegal to engage in bribery and corruption. In the United States there is the US Foreign Corrupt Practices Act which is applied to non-US firms. The UK Anti-terrorism, Crime & Security Act makes it illegal to make facilitating payments or gifts to government officials. When in doubt about the law, remember that it is important to Speak Up and raise the issue with your line manager or Legal Team who can clarify the position on the issue.

Human Rights

In the same way that we respect each other in the workplace, we have a responsibility to promote and protect human rights and to ensure that our operations do not contribute directly or indirectly to human rights abuses.

Human rights are a fundamental pillar of ethics and our guiding principles support this. We will seek to establish and adhere to clear ethical standards for ourselves and we will expect similar standards from all third parties who work with us or on our behalf.

We all need to:
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 organisation that fails to uphold basic human rights or one that might cause Belron® embarrassment by their links to inappropriate organisations or regimes.

Report any concerns about human rights abuse immediately.

Respect the rights of our colleagues to be involved in trade unions or collective bargaining arrangements.

Q I have received information that one of our suppliers is suspected of using child labour in their operations. We haven't been told this directly and I am not aware this has ever been an issue before. Should I ignore this?

A No. At Belron® we are committed to investigate any report we receive even if it turns out to be untrue. Talk to your line manager, someone in your local purchasing team or the Legal Team who will advise the appropriate action.

Q We are concerned that a new supplier may not be paying their employees at an acceptable level for their industry. Perhaps it is just a rumour, but I don't feel this aligns with Our Way of Working. What should we do?

A Belron® expects our business partners to adopt the standards of Our Way of Working, and that includes treating employees with respect and without exploitation. We will take these situations seriously even if they are just a rumour at this stage. It is important that you raise the concern. Talk to your line manager or contact the ethics Speak Up Line for the appropriate action to take.

Respect for the Environment

How we treat the environment is a reflection of our ethics. Although the environment is not a traditional stakeholder, we take our responsibility for the environment very seriously and we are committed to minimising our environmental impact throughout our global operations.

We will respond to our environmental challenges by growing our business in a manner that is responsible and environmentally sustainable.

We all need to:
Demonstrate a commitment to the environmental standards Belron® has set by acting in accordance with our global and local environmental policies.

Support all local environmental initiatives such as minimising the impact of our travel, reducing water and energy consumption, and by recycling.

Challenge unsustainable behaviour by ourselves, our colleagues and our teams. We should all work towards achieving the environmental as well as business targets set by the company.

Where possible assess in advance the environmental impacts of any business decision we are responsible for.

Encourage and support our colleagues, our teams and ourselves to work in an environmentally sustainable way.

Work with others – suppliers, customers and business partners – to ensure that we operate in a way that reflects our commitment to the environment.

Q Whose responsibility is the environment?

A Our Way of Working demonstrates the guiding principle of respect. At Belron® we believe that operating as a responsible business involves respecting resources and the environment. By encouraging all employees to operate under this principle, we believe we can have a positive impact.

Q I've noticed that colleagues are not following recycling guidelines, at least as I understand them. Does our company have specific policies or standards that we are meant to follow?

A Your line manager can help you to understand the company guidelines for recycling. Additionally, Health and Safety managers can provide further guidance to you on recycling and related environmental issues. It is important that we all follow the correct procedures for recycling and disposal of waste. Some of the products that we use contain chemicals that must be disposed of properly. There can be penalties for the business for not following correct procedures.



How We Manage the Business

This section is directed specifically towards providing guidance for managers, though we encourage all employees to read it and understand how Our Way of Working runs throughout the management of Belron®. Here we outline several behaviours that are expected in order to uphold our guiding principles of integrity, respect and trust within the business. From the sustainability of our supply chain, through to keeping accurate records, we will ensure that we maintain the highest operating standard.

Guidelines for Managers

Everyone in Belron® is responsible for upholding this code and behaving in line with Our Way of Working and our principles. However as a manager you have an additional responsibility to set an example and support your team in ethical decision-making. You will also encounter more complex decisions and issues which will require good judgment.

Training will be offered to you and your teams that will bring the principles and behaviours expected within Our Way of Working to life and put them in the context of every day working scenarios.

As with all employees, the important thing to remember is to speak up if you are in doubt. Contact your regional manager, the Legal Team, or the Belron® Ethics Team if you need any clarification on a situation that you feel is not in line with Our Way of Working. The Speak Up line is also available to you should you require confidential advice.

All managers must:
Ensure your team have read and understood Our Way of Working and act in accordance with it at all times.

Undertake training and encourage your team to participate in the training that is offered to them around our ethical standards.

Set an example to your team and promote and reward ethical conduct.

Be available to employees who wish to report any conduct that may be considered in contradiction with Our Way of Working.

Q As a manager how can I set an example to my team and what are the suitable ways of rewarding ethical conduct?

A As a manager, you will be the first line of contact for your team should they encounter any ethical situations in their day to day operations. As such, you will have to read and understand the Belron® principles that are set out in this document which will form the basis of your decision-making process. To help your team in understanding the code, you will need to engage them in an open and honest discussion. We will also be giving you further guidance and tools that will help you to introduce and explain our code of ethics and its purpose to your team. In general, make sure that you are contactable at all times to listen to your team and be open and patient with them and take all concerns in good faith. You should also give credit to your colleagues where it is due so as to encourage and motivate them; this can take the form of verbal praise or a public commendation during team meetings.

Q We operate a very busy business and it is difficult for me to find the time to offer training to my entire team on ethics. This all seems like common sense – can't employees just read Our Way of Working in their own time?

A The training that is offered offers all employees a deeper understanding of Our Way of Working and makes the principles and behaviours concrete through discussion and examples of our expectations. The time invested in the training can help your business avoid issues in the future which could have a much greater impact. Endorsing the training demonstrates that you are leading by example. If you have a concern about the timing of training, speak to your manager about finding a more appropriate time.

Accurate Records

Accurate and reliable information is crucial to the running of any ethical business. To maintain our success we need to ensure that all our financial and business records are accurate and up to date.

All managers must:

Create and maintain accurate business and financial records in order to fulfil legal and regulatory requirements.

Willingly provide all necessary information to auditors.

Be alert for and immediately report any actual or potential misrepresentation of Belron® records, data or accounts.

Ensure that all our records, financial or otherwise, are accurate and true.

Demonstrate integrity and trust in submitting our own expenses and travel claims and when approving the claims of others.

Ensure that we only enter into contractual arrangements on behalf of Belron® that we are authorised to and are within the scope of our delegated authority.

Not backdate records such as agreements, financial records and expenses.

Q My manager asked me to change the date on a report. When I told her I wasn't comfortable doing so, she said that it was standard procedure and I shouldn't worry about it. I don't feel comfortable making the change. What should I do?

A Accuracy is paramount for the success of our business. However, the change may be immaterial to the report. Address the issue again with your manager and ask for a more thorough explanation. If you are still concerned raise your concern with HR.

Q When filling in my expenses claim, I realised that I had lost a receipt for something that I had purchased. The item in question was used in the course of business and is a valid expense. Can I list the expense without the receipt?

A Receipts for expenses are proof of purchase and it is very important that we have an accurate record of what was spent, and the value of the purchase. It is crucial to take care in safe guarding receipts for business purchases. Contact the vendor to see if you can get a duplicate receipt before you submit the claim.

Managing Our Reputation

Our brand is a symbol of the promise we make to our customers, employees and business partners.

We spend a lot of time, effort and money differentiating our service from any other in the market. Our brand names reflect this differentiation and so it is critical that we do whatever we can to protect them from others who may try to benefit from our efforts. If we do not use our trademarks in the correct way, then our case for stopping others from infringing them is potentially weakened.

We are continuing to build our brands in all the markets in which we operate so trademark protection will become even more important to us in the future.

We will be honest and transparent when promoting our products and services.

All managers must:
Know that the trademark compliance guidelines apply to all registered trademarks of the Belron Group and that the guidance can be found on the Belron® intranet.

Remember that if we are uncertain about how to use our trademarks in any way contact either the Belron® Legal or Sales and Marketing teams before commencing a project where our brands will be used.

Report any infringement of our trademarks by a third party (e.g. on vans, promotional advertising, literature or premises) immediately to the Legal Team or directly to Belron® Hungary Kft. - Zug Branch (see the contacts section at the end of this code). Do not communicate with the other party and do not take any legal action on your own.

Obtain guidance from the Legal Team for registering new trademarks.

Ensure that we represent our products and services truthfully and don't give deliberately misleading or inadequate descriptions in the marketing, advertising or other public communications to customers.

Ensure all of our marketing and promotional materials are in line with the Belron® Way Of Working and avoid the use of images or language that could be deemed offensive or inappropriate.

Q I was recently undertaking some competitor analysis and research online and noticed a competitor whose brand identity looked extremely similar to the brand identity of Belron®, so much so that I almost mistook it for our own brand. What should I do?

A You should immediately report this to the Legal Team along with all the relevant details.

Q The advertising firm that we have consulted has come up with a catchy advertisement about the durability and strength of our windscreen glass. The idea is that our glass is so strong, it will protect drivers even in an accident. Everyone in the department, including our manager, loves it and feels that the audience would understand that this is just a spoof hence not meant to be taken literally. While I do agree that it certainly is an engaging advert, I am worried that we will get into trouble for misrepresentation and providing false information to our audience.

A It is right for you to be concerned, and you should check the advert with the Legal Team for further guidance before finalising it. We have to ensure that we represent our products and services truthfully and don't deliberately give misleading descriptions in advertising communications to the public.

Confidential Information

We all have access to confidential information through our work every day. Breaking confidentiality damages the trust people place in us as a business.

We all have a duty to ensure that all information not in the public domain is kept confidential. Our confidential information is critical to us maintaining our reputation and protecting our brands and our business.

We should only disclose confidential information to others who have signed and are therefore bound by confidentiality agreements.

All managers must:

Ensure we do not disclose confidential information to anyone not authorised to receive it whether within the company or outside.

Remember that the parent company of Belron®, D’Ieteren, is listed on the Belgium stock exchange so any disclosure of sensitive or confidential information, especially concerning the company’s performance, can have a material impact on the share price or may require D’Ieteren to make a market disclosure.

Respect the confidential information of others whether or not a confidentiality agreement has been signed and never discuss confidential information with non - Belron® employees unless they are bound by confidentiality agreements.

Be careful about who we share confidential information with internally and only share information on a need to know basis. That way we can minimise the risk of inadvertent disclosures outside Belron®.

Ensure that we have got the appropriate permissions and sign off to share any confidential or company sensitive information externally. This includes marketing and promotional literature, press releases, company videos or media programmes.

Q I am considering appointing a contractor to do some work for us and I want to get quotes from three or four candidates. All have asked for detailed information about Belron®. Can I give it to them?

A First you need to look at how much of the information requested is actually necessary to disclose for the purpose. We should disclose only as much as they need to know. Second, contact the Legal Team and they will provide you with a confidentiality agreement (also known as a non-disclosure agreement) for the candidates to sign. If they won’t sign it they should not receive the information.

Q I have just joined Belron® from a competitor and brought lots of information which I think would be useful to the company. My colleagues are asking me questions about the other company. Is it ok to share information with my new team?

A Not if the information is of a confidential nature. If the work is not in the public domain it remains confidential even if you have left the company. You have been hired for your experience and expertise not the information you have about a competitor.

Q A friend who works for a similar company would like to discuss the similarities and differences between his place of work and mine. What shall I do?

A There is no harm in talking in general terms about what we do. You are an ambassador for Belron® and so should be cautious when talking about the company to others (and respect confidential information) even if they are a close friend.

Money Laundering & Fraud

Fraud is an offence that affects our integrity, and leads others to mistrust our business.

Falsifying records may constitute fraud and could result in criminal penalties not only for Belron®, but also for the individual involved.

Money laundering is a criminal activity that is often hard to spot, but could leave the company vulnerable and could severely damage our reputation. Being involved in this activity can also lead to prosecution.

We will not tolerate irregular financial transactions or fraud.

All managers must:
Ensure irregular financial practices do not arise in any aspect of our operations.

Follow the appropriate policies to prevent such transactions in the first instance.

Exercise caution and good judgment when confronted with any suspicious transactions and report such activity to the Legal Team.

Q I am not a financial expert. What is money laundering?

A Money laundering is when money which has come from illegal activities is “filtered” through a series of transactions in order to “clean it” and give it the appearance of coming from legitimate and legal sources. It is a criminal activity.

Q One of our customers has asked if they can pay through a mix of different accounts using a combination of cheques and cash. Is this acceptable?

A You are right to be suspicious of these sorts of transactions as it could indicate money laundering. Inform your line manager or a member of the Belron® Legal Team before responding.

Competition & Competition Law

Belron® has achieved its position as the world’s leading vehicle glass repair and replacement business through a sustained focus on providing better value for money than its competitors.

Free and fair competition is fundamental to our success as it provides the level playing field on which we operate.

As such, it is essential that we continue to operate in a competitive manner, respecting and complying with all competition laws in everything we do.

A breach of competition law not only results in severe penalties, negative publicity and a loss of momentum for us, but also gives our competitors an immediate gain.

All managers must:
Ensure that you read and understand the policy which can be found on the Belron® Intranet microsite and, most importantly, comply with it at all times. See the Contacts section at the end of this document for more details.

Understand the set of 13 Key Operating Principles which form the heart of the policy, and which we as a group have chosen to follow to ensure our continued success based on free and fair competition and compliance with competition law.

Never compromise the guidelines and principles, regardless of apparent commercial advantages.

Understand that is the individual obligation of all Belron® employees to comply with the policy and to ensure compliance by all those who report to them.

Contact the Belron® Legal Team immediately if you are unsure about compliance in a specific situation.

Q At a conference recently I came across documents from a competitor left behind in a seminar room containing confidential pricing information for an upcoming product roll-out. How should we treat this information and use it to our advantage?

A We should only obtain information about a competitor’s strategy or confidential business through approved exchanges of information. You should immediately inform the Belron® Legal Team as this kind of document must always be the subject of a reply or a clarifying note to file.

Q I am putting together a press release about Belron® and how we compare to our competition. What can I say about our competitors?

A Statements stressing the weakness, inadequacy or incompetence of competitors should be avoided. However, the statement of publicly known facts about our competitors, without any negative personal evaluation, does not raise any legal concern.

Sustainable Procurement

We are committed to approaching every area of our business in a responsible way. Where we buy things from reflects our own business ethics. We will seek to procure high quality products from responsible and sustainable sources, and to minimise the environmental impact of our supply chain.

All managers must:
Use products that provide consistent safety, quality and reliability and that are from reputable suppliers.

Where possible seek to procure products from responsible and sustainable sources, to minimise

the impact of our supply chain and to actively promote waste management activities. Only use products that meet internationally accepted standards.

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.

Q We have been using a key supplier for a while but recently there have been rumours of bad environmental practices at one of their production plants. There are alternative suppliers in the market, but this supplier offers the lowest cost by far. Can we ignore the rumours, which are unsubstantiated anyway, at least until the contract expires next year?

A No. While these rumours are unsubstantiated, we need to conduct our own checks to clarify these claims. It is therefore critical that you inform your line manager immediately so that action can be taken. While cost is obviously an important factor, we would still prefer suppliers who can demonstrate socially, environmentally responsible and high standards of ethical behaviour.

Q Our key supplier has informed us about a new technology which significantly reduces the energy requirements of their production process for our materials. However, they will need financial help from us to implement this technology. What is the company position on this?

A At Belron® we will seek to minimise the impact of our operations and we will support suppliers wherever we can to meet our standards. However, we will need more information before we can decide. Find out more information and talk to your line manager, a member of the Belron® Supply Chain team, or Belron® Technical directly before taking this further.



Our Way of Working: Remember

We must all be familiar with Our Way of Working and be an example of the behaviours and principles described in this code of ethics.

Our Way of Working is about making Belron® a great place to work. For Belron® to continue to grow, we must protect the principles and behaviours that have made us a success. We are all responsible for ensuring that Our Way of Working is demonstrated throughout the business each and every day.

And most importantly, remember that we can all speak up.

If you are at all concerned with what you see, it is best to speak up. Any issue raised in good faith will receive the proper and appropriate attention. First speak to your line manager or a senior manager within the company. They will address your concern and determine the best course of action.

If you feel uncomfortable discussing an ethical concern with them, the Speak Up line is available for you to use at any time.

Contacts & Resources

Belron® Legal

Katherine Marshall

katherine.marshall@belron.com

Legal Guidelines including anti-trust policy

bconnect.belron.com/AboutBelron/LegalGuidelines

Trademarks Guidelines

bconnect.belron.com/TrademarkGuidelines

For any queries about Belron® trademarks:

trademarks@belron.ch

Speak Up Line & Web Reporting

Navex Global

belron.ethicspoint.com

Australia	1800 831 230
Austria	0800 281462
Belgium	0800 79 683
Canada	844 955 1646
Denmark	80 25 40 97
Finland	0800 413708
France	0 800 91 09 68
Germany	0800 1862206
Italy	800 582 755
Netherlands	0800 0230153
New Zealand	0800 753 248
Norway	800 62 311
Portugal	800 180 836
Spain	900 999 371
Sweden	020 88 85 70
Switzerland	0800 896 145
UK	0800 069 8189
USA	1800 913 7183

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