



**Communication on Progress (COP) of the  
UN Global Compact's Ten Principles 2013**

**May 2013**

**CEO Statement of continued support**

Belron® is pleased to reaffirm its support of the Ten Principles of the United Nations Global Compact.

The Global Compact's Ten Principles are embedded in all that we do - in the way that we operate our business and treat our people, the way we manage our impact on the environment and the way in which we give back to the communities we work in.

We continue to develop our reputation for being a trusted and respected company in the eyes of our people, our customers and our partners. The Belron® business continues to be guided by its four Corporate Responsibility commitments which influence all of our day-to-day operations:

**Ethics** – all employees understand the responsible way of working

**Our people** – we create a fantastic work environment by recognising and encouraging development within an open and honest organisational culture

**Giving Back** – we support every business unit to become involved in giving back to their local community and we go beyond this by supporting causes as a global group

**Environment** – we work hard to manage and reduce our impact on the environment and we are taking meaningful steps to continuously improve in the long term

Being a signatory to the UN Global Compact enables us to demonstrate to all our stakeholders our commitment to being a sustainable business.

Our approach provides a platform for meeting the requirements of a number of external standards and commitments, including the United Nations Universal Declaration of Human Rights and the United Nations Global Compact and is most evident in our Code of Ethics – Our Way of Working.

In this Communication on Progress we provide a summary of the activities of Belron® in relation to our ongoing commitment to the UN Global Compact's Ten Principles.

**Gary Lubner CEO, Belron®**



At Belron® we are committed to ensuring that we have the highest standards of ethical conduct in everything that we do and we believe that everyone has a role to play in this. We have a clear set of principles that guide the decisions and support the actions of everyone at Belron®, wherever they are in the world.

Ethics has always been core to the way we work at Belron® and as we grow and move into new markets we need to be clear about the behaviours we expect of all our people.

## **Human Rights**

<b>Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and</b>
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<b>Principle 2: Businesses should make sure they are not complicit in human rights abuses</b>
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All Belron® operations continue to be managed and operated to high ethical standards that protect and support the rights and interests of all human beings. All employee, contract and supplier working conditions are required to be compliant with national legislation and in cases where this is deemed insufficient, with the relevant International Labour Organisation (ILO) Standards. Belron® has systems in place to ensure that the Articles of the United Nations Universal Declaration of Human Rights are assessed, prioritised and implemented as they apply to our sphere of influence. This means that in no instance will inhumane treatment of employees be acceptable including any form of forced labour, physical punishment or other abuse.

In 2010 we established a supplier audit programme to ensure the integrity of our supply chain. Our audit criteria is designed to reflect the principles of the UNGC, legislative requirements and our own Code of Ethics – Our Way of Working. This ensures that those working with us also comply with our high standards and principles.

The Belron® Code of Ethics – Our Way of Working awareness session is available to new employees as part of their induction programme. This session, which includes raising awareness and training employees specifically on Human Rights, has been delivered to our employees across the Group. Many of our businesses have begun a recertification programme to ensure the code is kept ‘alive’ for our employees.

Belron® encourages all its employees to speak up when they see a situation that they believe is not in keeping with the Our Way of Working principals. It may be something which affects the employee personally, or their colleague, or something which could impact the reputation of Belron®.

The independent Speak Up line enables our employees and anyone beyond the organisation to report anything they believe is not in keeping with the commitments we have made as an organisation including any perceived infringements of their rights. During 2012, all issue calls to the Speak Up line were investigated and resolved.



## **Labour**

<b>Principle 3: Businesses should uphold the freedom of association and the effective recognition of the rights to collective bargaining</b>
<b>Principle 4: Businesses should support the elimination of all forms of forced and compulsory labour</b>
<b>Principle 5: Businesses should support the effective abolition of child labour</b>
<b>Principle 6: Businesses should support the elimination of discrimination in respect of employment and occupation</b>

Every Belron® business unit respects the right of all employees and contractors to be involved in trade unions or collective bargaining arrangements. We engage directly with our people through well-developed communication programmes, but we ensure that we as a business and our suppliers uphold the freedom of association and the effective recognition of the right to collective bargaining.

The Belron® Code of Ethics upholds this right. Where we have employee representatives we ensure that they are able to fulfil their duties without discrimination and that employee representatives have access to their members in the workplace.

Our Code of Ethics commits us to ensure that our operations do not contribute directly or indirectly to human rights abuses. We will not work with any organisation that fails to uphold basic human rights and includes any form of forced labour, physical punishment or other abuse. We are completely committed to reporting any concerns about human rights abuse immediately. Our independent Speak Up line enables any employee to report any direct violation of this internally and our on-going supplier audits will check that those working for us do not commit such violations.

Belron® outlaws the use of child labour in any form. We do not employ anyone below the age of 16 or the local legal minimum employment age should this be different in a country we operate in. We will not use suppliers who use child labour in any manner. This is one of the areas covered by our on-going supplier audits.

In support of our on-going supplier audit programme we have developed a global supplier code of conduct. Key suppliers will be required to demonstrate acknowledgment and actively support the code.

At Belron® any form of discrimination based on race, nationality, religion, age, disability, gender, marital status, sexual orientation, pregnancy, union membership or political affiliation is unacceptable. We have policies and procedures in place should such situations arise to deal with them promptly and effectively.



Our commitment to eliminate discrimination is set out in the Belron® Code of Ethics and there is a specific focus on this as part of awareness sessions. We encourage our employees to speak up should they encounter any form of unfair discrimination in order to eliminate it should it occur.

In 2012 the Belron® business in the US, Safelite® Autoglass, was recognised for their strong business ethics by the Central Ohio Business Bureau's Centre for Character Ethics, which honoured the company with a 2012 Torch Award for Ethical Enterprising.

As well as welcoming diversity in our workplace we are completely committed to creating working environments in which everyone feels valued and can be heard. We are constantly creating a culture of communication with all employees using surveys, newsletters, the intranet, workshops and forums.

At Belron® we also have in place global recognition programmes [www.belronheroes.com](http://www.belronheroes.com) and showcase our employees' talents at worldwide events such as Best of Belron® <http://www.bestofbelron.com>.

The Belron® business in Greece was recognised during 2012 as one of the best places to work by the Great Place to Work® Institute, an award programme which our businesses in France, Belgium, Italy and the US have already been recognised in.

## **Environment**

<b>Principle 7: Businesses should support a precautionary approach to environmental challenges</b>
<b>Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility;</b>
<b>Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies</b>

At Belron® we take our responsibility for the environment very seriously and we aspire to grow our business in a manner that is environmentally sustainable. In order to achieve this we apply a precautionary approach in our decision-making and integrate environmental principles into our business strategy as outlined in our global Code of Ethics.

Throughout 2012 Belron® has maintained its commitment to improving its environmental performance. We know that one of our most important environmental impacts is CO<sub>2</sub> emissions and we measure these on an annual basis across our global business.

Reducing the emissions from our fleet has been a key focus. Many of our business units have embarked on driving training for their technicians to improve their efficiency and safety when they are in their fitting vehicles. Telemetry has also proved to be an effective



method in reducing our carbon footprint. On-board systems which provide feedback to drivers to assist them in driving in an optimum way have been installed in a number of vehicles. These systems have assisted Belron® in reducing its fuel consumption and consequently its emissions.

Belron® also continues to review alternative fuel technologies to see how it can incorporate them into its future fleet. Low carbon vehicles will be a key element in reducing our environmental impact and we are determined to find a solution to successfully integrate these vehicles into our fleets. In 2012 we established a long term electric vehicles (EV's) trial in The Netherlands. The initial results indicate within the correct urban setting these vehicles are able to perform equally to our standard fleet, but with zero emissions.

Waste reduction and recycling still remain a key focus for Belron® operations. We reduce vehicle glass waste as much as possible by repairing windscreens first. Where this is not possible we aim to recycle the glass, however in some of our operations the infrastructure to support recycling does not exist. Our US market was an example of a location where there was a lack of suitable glass recycling capability. However, through an innovative glass recycling programme for the US market established in 2012, we have been able to divert glass from landfill. When fully implemented the programme expects to divert approximately 15,000 tonnes of material from landfill every year.

Our supplier management process requires our business partners to adhere to our environmental principles and our supplier audit monitors and evaluates their environmental performance.

Five of our business units have implemented ISO 14001 certified environmental management systems, with one more hoping to gain certification by the end of 2013.

## **Anti-Corruption**

<b>Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery</b>
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Our ethical principles are in place to ensure that offences such as bribery and corruption are not tolerated within the business and our approach to it is detailed in the Code of Ethics. This Code applies throughout the Group and sets out our clear principles and guidelines for the prevention of bribery and corruption, money laundering and fraud.

Belron® itself will not accept or offer money to induce favourable treatment for Belron®, for example, accepting money from or donating money to any employee of a government organisation or a government official. Similarly, we do not tolerate any such activity by our employees or by those with whom we do business.



All Belron® employees, contractors and external parties are encouraged to raise any genuine concern about any suspected misconduct or malpractice, including bribery, facilitation payments, extortion and money laundering provisions, ethical misconduct or any perceived infringement of their rights through our independent Speak Up line. All concerns are properly investigated in a fair and effective manner and we have mechanisms in place to ensure that no form of retaliation or reprisal for reporting suspected infringements takes place as a result of any raised concern.

Our internal Risk department ensures consistency with our anti-corruption commitment by completing periodic internal reviews throughout our operations. Our legal team provides training and awareness to all our business units on anti-corruption law and our anti-corruption policies to ensure that we continue to compete fairly and in compliance with all applicable anti-bribery laws.

All UK Boards have adopted the policy on anti-bribery outlined in our Code of Ethics. They have completed a comprehensive risk assessment of the UK operations taking into account wider geographical implications and are currently in the process of implementing the findings. Other Group businesses are undertaking their own assessments as necessary, taking into account local conditions and requirements.

**How do you intend to make this COP available to your stakeholders?**

Our COP is available through our internal intranet and on our external website <http://www.belron.com/About-us/Corporate-social-responsibility/Our-reporting-approach/UN-Global-Compact.aspx>.

We are orienting our corporate responsibility reporting towards the GRI framework (C-level).