

Description of the procedure "Reporting risks or violations regarding human rights or environmental matters at Carglass® or Belron Ltd.".

To whom does this procedure description apply?

This procedure description applies to all persons who submit a report via the Carglass® or Belron Ltd. Supplier Speak-Up Line (supplierspeakupline@carglass.de). This description regulates how Carglass® and Belron Ltd. proceeds when receiving reports via the Supplier Speak-Up Line, who is responsible for the processing and how the processing takes place. In addition, it also regulates how reporters (= whistleblowers) are protected.

Which infringements can be reported?

The Supplier Speak-Up Line can be used to report **risks or violations regarding human rights or environmental matters within our supply chain**. Our supply chain consists of all products or services that Carglass® and Belron Ltd. directly or indirectly sources to provide its service (replacement and repair of car windshields). This means that any risks or violations that occur at a company from which we source products or services to provide our service can be reported.

Human rights risks or environmental risks are risks that could **endanger fundamental human rights in particular** or could have a **strong negative impact on the environment**.

Human rights risks include in particular:

- Child labour
- Forced labour
- Torture
- Slavery, debt bondage and exploitation
- Discrimination
- Withholding/refusal to pay the appropriate wage
- Causing harmful soil changes
- Unlawful eviction or deprivation of land
- Occupational safety and health violations
- Violations of the freedom of association
- Commissioning of security forces to prevent (external) controls

Environmental risks include in particular:

- The use of mercury and mercury compounds
- The use and production of certain chemicals (according to the POPs Convention)
- The non-environmentally sound handling, storage or disposal of the above-mentioned chemicals
- The import and export of certain chemical wastes

Important: The examples listed above cover most risks related human rights or environmental matters. Nevertheless, this list is not exhaustive.

How can risks or violations be reported?

Risks or violations regarding human rights or environmental matters can be reported in **absolute confidentiality at the** e-mail address supplierspeakupline@carglass.de. The e-mail address is managed by the Human Rights Officer and **only the Human Rights Officer** has **access to this mailbox**. This ensures that every report is treated absolutely confidential and is only viewed by persons who are necessary for the processing and handling of the report.

The Human Rights Officer is **independent and free from instructions** in his/her function as Human Rights Officer and carries out all his/her duties in absolute confidence.

In addition to the Supplier Speak-Up Line, the internal whistleblowing system (Speak-Up Line) is also available for internal Carglass® employees. Internal employees can therefore freely choose which channel they would like to use to report risks or violations regarding human rights or environmental matter.

Who is responsible for investigating the report?

The Carglass® and Belron Ltd. Human Rights Officer is responsible for the overall investigation of the report. The officer is the only one who has access to reported violations and is also responsible to initiate and, if necessary, lead the further (internal or external) investigation.

What is the procedure after submitting a report?

All incoming reports are treated with absolute confidentiality and are carefully investigated. The investigation process is described below and illustrated again in diagram 1:

- 1) A report is submitted via the Supplier Speak-Up Line
- 2) The Human Rights Officer shall acknowledge receipt of the report to the whistleblower within 7 days.
- 3) The Human Rights Officer then assesses whether sufficient information is available to make an initial assessment of the risk or violation. Sufficient information exists if the Human Rights Officer can assess which supplier is involved and which conduct is being carried out or omitted that poses a risk or a violation. If there is not enough information, the Human Rights Officer will ask the whistleblower for further information.
- 4) If sufficient information is available, the human rights officer makes an initial assessment of the report. In doing so, the Human Rights Officer assesses whether or not, on the basis of the information received, a possible human rights or environment-related risk or a human rights or environment-related violation may exist.
- 5) If there is no risk and no violation, the Human Rights Officer writes to the whistleblower informing him or her that no further investigation of the report will be carried out. The Human Rights Officer is also obliged to inform the whistleblower of the reasons for this.
- 6) If there is or could be a risk or violation, the Human Rights Officer will initiate an investigation. The Human Rights Officer will also inform the whistleblower and describe the next steps.
- 7) The concrete investigation depends on the individual case. However, if it is possible and expedient (without putting the whistleblower at any risk of sanctions), the human rights officer will contact the company concerned and try to remedy the behaviour as quickly as possible. In doing so, particular attention will be paid to preserving the anonymity of the whistleblower vis-à-vis the company concerned.
- 8) The whistleblower will be regularly informed by the Human Rights Officer about the current status during the investigation and the associated remedial measures. The whistleblower also

has the opportunity to report on changes that have already been implemented in the company concerned.

- 9) After completion of the investigation and implementation of the remedial measures, the Human Rights Officer will document the facts of the case and the measures taken. The whistleblower will be informed of the outcome of the investigation and the corrective measures taken by the Human Rights Officer.
- 10) The Human Rights Officer implements (together with the company concerned, if applicable) a process to review the effectiveness of the remedial actions taken.

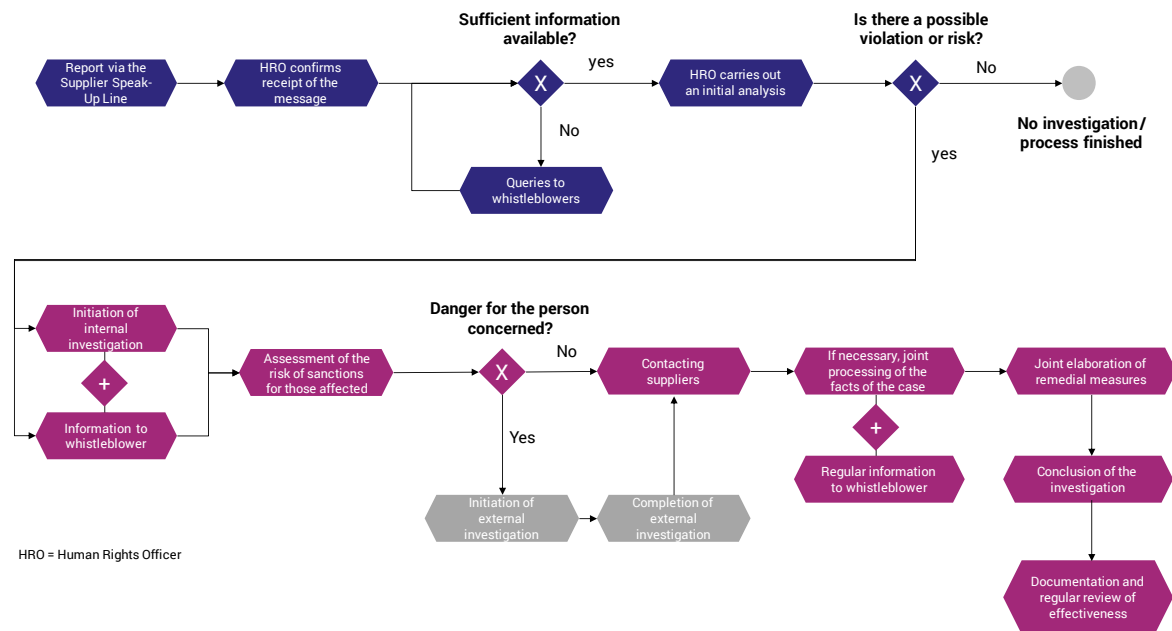


Figure 1: Illustration of the process flow when receiving reports via the Supplier Speak-Up Line

How are whistleblowers protected?

All information received will be **treated with absolute confidentiality and carefully processed**. The Human Rights Officer will directly direct contact the whistleblower and, if there are sufficient indications, will initiate an internal investigation. The **disclosure of personal data or data/information to third parties** (e.g. suppliers, external law firms or other organisations) **that would allow conclusions to be drawn about the identity of the whistleblower** will only take place with the **prior consent of the whistleblower**. The investigation is designed at all times to ensure the best possible protection of the whistleblower.